

Charles D. Newton
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**NORTHERN DISTRICT COURT OF THE STATE OF OHIO
FOR THE COUNTY OF CUYAHOGA**

CHARLES D. NEWTON
Plaintiff

vs.

KIMBERLY KARDASHIAN, AKA KIM
KARDASHIAN, KRIS JENNER,
KOURTNEY KARDASHIAN-
BARKER, KHLOE KARDASHIAN,
KYLIE JENNER, KENDALL JENNER,
HALLE BERRY, BEYONCE
KNOWLES-CARTER, SHAWN
CARTER, AKA JAY-Z, KANYE
WEST, AKA YE, JOHN & JANE
DOES 1-100

Defendants

Case No.:

1:24 CV 00027

Judge:

JUDGE CAI ABRESE

MAG JUDGE ARMSTRONG
Court Room:

COMPLAINT FOR:

- (1) COMPUTER FRAUD
- (2) COPYRIGHT INFRINGEMENT
- (3) INVASION OF PRIVACY
- (4) CONSPIRACY
- (5) TORTIOUS INTERFERENCE
- (6) FRAUD AND FRAUDULENT MISREPRESENTATION
- (7) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
- (8) ASSAULT

DEMAND FOR JURY TRIAL

Receipt #149504 \$405.00 1/5/2024 CWH

I. INTRODUCTION

1. The PLAINTIFF CHARLES D. NEWTON (hereinafter Mr. Newton) brings forth this civil action pursuant to the listed federal codes against the ***high-profile*** Defendants named herein. It is his firm belief based on knowledge and facts that the Defendants have both intentionally and maliciously violated his civil rights.
2. This ***whistleblower*** complaint meets the “***preponderance of the evidence***” standard. “***That there is a 50% chance the claims are true.***” - Karch v. Karch, 885 A.2d 535, the Superior Court of Pennsylvania.
3. Further, the Supreme Court introduced a heightened standard for complaints in 2007 with the case Bell v Twombly. “***A complaint must allege enough facts to state a claim for relief that it is plausible on its face.***” This complaint more than sufficiently rises to that threshold.
4. Mr. Newton, a screenwriter, pitched via Instagram direct message a unique horror feature he wrote specifically for the family Defendants Kardashians-Jenners starring Kim Kardashian, titled “I Know What You Did to Me.” No response.
5. Upon detecting suspicious activities (***cybersecurity/cyberstalking***) Mr. Newton began to set what he calls, “cyber traps,” for the Defendants. Consistently, the latter would take the bait.
6. The Defendants have either ***overtly or covertly manifested*** their illicit activities primarily via their respective social media posts.
7. Also, there exists in real time a consistent pattern of Mr. Newton’s activities online and offline (before) ***followed*** by the Defendants’ activities (after).
8. This consistent template established a ***contextual timeline of evidence.***

- 1 9. More heinously, the high-profile Defendants' social media posts implicate their advanced,
2 detailed knowledge and involvement in the *kidnapping and murder-for-hire* of Mr.
3 Newton's first cousin THADDEUS LAWRENCE COLEMAN (hereinafter TLC).
4
5 10. "The entire family will come after you. Using their fame, wealth, and power to take you
6 down. They will spread lies about you. A powerful and vindictive family." – White v
7 Kardashian – BC 680035 Oct 17, 2017, LA Superior Court - Civil Complaint
8
9

10 II. PARTIES

- 11 11. Plaintiff CHARLES D NEWTON is a writer and screenwriter. He is the Executive
12 Producer of Sir Newton Motion Pictures. He is an actor and director. Mr. Newton is also
13 a Google-trained Data Analyst and is currently studying law at Penn University.
14
15 12. Defendant KIMBERLY KARDASHIAN aka KIM KARDASHIAN is an individual, who
16 is a California citizen, who currently resides, owns property, and does business in Los
17 Angeles. She has been dubbed "The Selfie Queen and Queen of Social Media."
18
19 13. She is best known for starring along with her family on E! network's "Keeping Up With
20 the Kardashians."
21
22 14. She is currently in a reality show with the Hulu network. Ms. Kardashian is also
23 appearing on "American Horror Story," on the FX network.
24
25 15. Ms. Kardashian is also a model and recent divorcee with four children. The ex-wife of
26 Defendant Kanye West aka Ye.
27
28 16. Defendant KRIS JENNER is an individual, who is a California citizen, who currently
resides, owns property, and does business in Los Angeles. She is the so-called "Momager"
to all her children. She acts as their business manager. With oversight over their

1 respective business interests. Defendant Kris Jenner is best known for starring with her
2 family on “Keeping Up with the Kardashians.” She also owns and operates Jenner
3 Communications which is in Los Angeles.
4

5 17. Defendant KOURTNEY KARDASHIAN-BARKER is an individual, who is a California
6 citizen, who currently resides, owns property, and does business in Los Angeles.

7 Defendant Kourtney Kardashian is a reality television personality, socialite,
8 businesswoman, model, wife, and mother. She too is best known for starring with her
9 family on “Keeping Up with the Kardashians.”
10

11 18. Defendant KHLOE KARDASHIAN is an individual, who is a California citizen, who
12 currently resides, owns property, and does business in Los Angeles. Defendant Khloe
13 Kardashian is a reality television personality, socialite, businesswoman, model, and
14 mother. She too is best known for starring with her family on “Keeping Up with the
15 Kardashians.”
16

17 19. Defendant KYLIE JENNER is an individual, who is a California citizen, who currently
18 resides, owns property, and does business in Los Angeles. Defendant Kylie Jenner is a
19 reality television personality, socialite, businesswoman, model, and mother. She too is
20 best known for starring with her family on “Keeping Up with the Kardashians.”
21

22 20. Defendant KENDALL JENNER is an individual, who is a California citizen, who
23 currently resides, owns property, and does business in Los Angeles. Defendant Kendall
24 Jenner is a reality television personality, socialite, businesswoman, and world-renowned
25 model. She too is best known for starring with her family on “Keeping Up with the
26 Kardashians.”
27
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1 **21.** Defendant HALLE BERRY is an individual, who is a California citizen, who currently
2 resides, owns property, and does business in Los Angeles. Defendant Halle Berry is a
3 brand ambassador, businesswoman, world-renowned actress, and mother.

4 **22.** Defendant BEYONCE KNOWLES-CARTER is an individual, who is a California
5 citizen, who currently resides, owns property, and does business in Los Angeles.

6 Defendant Beyonce Knowles-Carter is a brand ambassador, businesswoman, world-
7 renowned singer-performer, wife, and mother.

8 **23.** Defendant SEAN CARTER AKA JAY-Z is an individual, who is a California citizen,
9 who currently resides, owns property, and does business in Los Angeles. Defendant Sean
10 Carter aka Jay-Z is a businessman, world-renowned rapper-performer, husband, and
11 father.

12 **24.** Defendant KANYE WEST AKA YE is an individual, who is a California citizen, who
13 currently resides, owns property, and does business in Los Angeles. Defendant Kanye
14 West aka Ye is a businessman, world-renowned rapper-performer, husband, and father.

15 **III. JURISDICTION/VENUE**

16 **25.** This venue is proper under 28 USC §§1331 – Federal questions – District courts shall
17 have jurisdiction of all civil actions arising under the Constitution, (federal) laws, or
18 treaties of the United States.

19 **26.** This venue is proper under 28 USC §1332 Diversity Jurisdiction – Diversity of
20 citizenship. Plaintiff of a different U.S. state than the Defendants.” Also, the amount in
21 controversy must be larger than \$75,000.00.

22 **27.** This venue is proper under *Personal Jurisdiction* based on two U.S. Supreme Court
23 tests:
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- 1 **28. Continuous, Systematic, Contacts and Related Lawsuits.** – When the Defendant’s
2 activity in the forum (state) is continuous and systematic and the cause of action is related
3 to that activity.
4
- 5 **29.** THE DEFENDANTS have persisted in interstate- 18 USC §1030 - Computer Fraud
6 (unauthorized access ie. Hacking) & Abuse Act, across ALL the Plaintiff’s networks.
7 (Various Plaintiff-sponsored cybersecurity traps reveal their persistent clandestine
8 activities. See Complaint)
9
- 10 **30.** (DEFENDANT KIM KARDASHIAN’S July 18, 2023, Instagram post. “Risk and you
11 shall receive.” The second image contains a *veil death threat: via drowning*).
12
- 13 **31.** Same demise as Mr. Newton’s first cousin THADDEUS L. COLEMAN. On April 29,
14 2023, the latter’s body was retrieved from Lake Erie, East 55th St. Marina.
15
- 16 **32.** 18 USC §113 (A)(1)(3) “*Assault with the intent to commit murder...*” “assault with a
17 deadly weapon with the intent to do bodily harm.” Defendants directed towards Mr.
18 Newton, a resident of Ohio.
19
- 20 **33. Continuous, Systematic, Contacts and Unrelated Lawsuits.** – East Cleveland Police
21 Department and Cleveland Metroparks Detectives HQ have unlawfully shared Mr.
22 Newton’s Written Statement and *confidential evidence* with the Defendants.
23
- 24 **34.** Suggests organized crime. See Complaint. (FBI-Cleveland And Ohio Organized Crime
25 And Investigation Commission notified via Registered mail on August 24, 2023.
26
- 27 **35.** U.S. Department of Justice – Civil Rights Division – Inspector General notified
28 September 3, 2023, Record number 340-635-CZZ.

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IV. STATEMENT OF FACTS

36. On or around February 2018, NEWTON moved from Cleveland, Ohio, to Los Angeles, California.

37. He began to draft a screenplay based on the personal true crime story he wrote. The second edition is entitled: “Emerging Cleveland Strangler: The Vernice Crutcher Untold Story.”

38. Mr. Newton would later pitch the female lead character (Vernice Crutcher) to Defendants HALLE BERRY and BEYONCE KNOWLES-CARTER respectively. They were doing so via their agents, entertainment company, by way of email, and privately through Instagram via DM (direct message). Maliciously, *behind the scenes* Defendant Kim Kardashian consistently *sabotaged* Mr. Newton’s casting direction. It was facilitated by cybersecurity/cyberstalking.

V. THE PRIVATE MOVIE PITCH VIA INSTAGRAM DM

39. On November 15, 2018, screenwriter Mr. Newton privately pitched a customized horror screenplay that he wrote entitled “*I Know What You Did to Me,*” via Instagram direct message (DM) to the Defendants: KIM KARDASHIAN, KOURTNEY KARDASHIAN, KHLOE KARDASHIAN, KRIS JENNER, KYLIE JENNER, AND KENDALL JENNER. It starred KIM KARDASHIAN.

40. **The pitch included the screenplay title page, box office projections (\$500M Domestically and \$1.1B Worldwide), and a graphical storyboard.**

41. The premise was inspired by “I Know What You Did Last Summer.” – A FISHERMAN seeks revenge on a group of teenagers who presumed they killed him. Similarly, KIM

43. It should be noted whether a recipient “ACCEPT” or “DECLINE” can still *view* the contents.



WGAWEST REGISTRY



Documentation of Registration

PLEASE PRINT THIS PAGE FOR YOUR RECORDS

Registrant

Registrant: Charles D Newton

Author(s)

Author: Charles D Newton

I Know What You Did to Me

Registration Number: 1979952

MATERIAL TYPE:

FILE NAME: I Know What You Did to Me WGAW.pdf

EFFECTIVE DATE: 12/12/2018

EXPIRATION DATE: 12/12/2023

Thank you for your registration. Your material has been successfully registered with the WGAW Registry. Registrations are valid for a term of five years and can be renewed upon expiration. Please note that changes cannot be made once your registration is completed.





Box Office Mojo **3 ACADEMY AWARD NOMINATIONS** **COLD WAR** **FOR YOUR CONSIDERATION** **LEARN MORE**

I Know What You Did to Me

Domestic Total Gross: \$538,232,657.00

Distributor: **Warner Bros. (New Line)** Release Date: **Halloween 2020**

Genre: **Horror** Runtime: **90 minutes**

MPAA Rating: **R** Production Budget: **\$50 million**

Summary **Daily** **Weekend** **Weekly** **Foreign** **Similar Movies**

Total Lifetime Grosses

| | |
|--------------------------------------|--------------|
| Domestic: \$538,232,657.00 | 46.8% |
| + Foreign: \$611,837,123.00 | 53.2% |
| Worldwide: \$1,150,069,780.00 | |

Domestic Summary

Opening Weekend: \$123,403,419
#1 rank at 102 theaters 420.07%

The Players

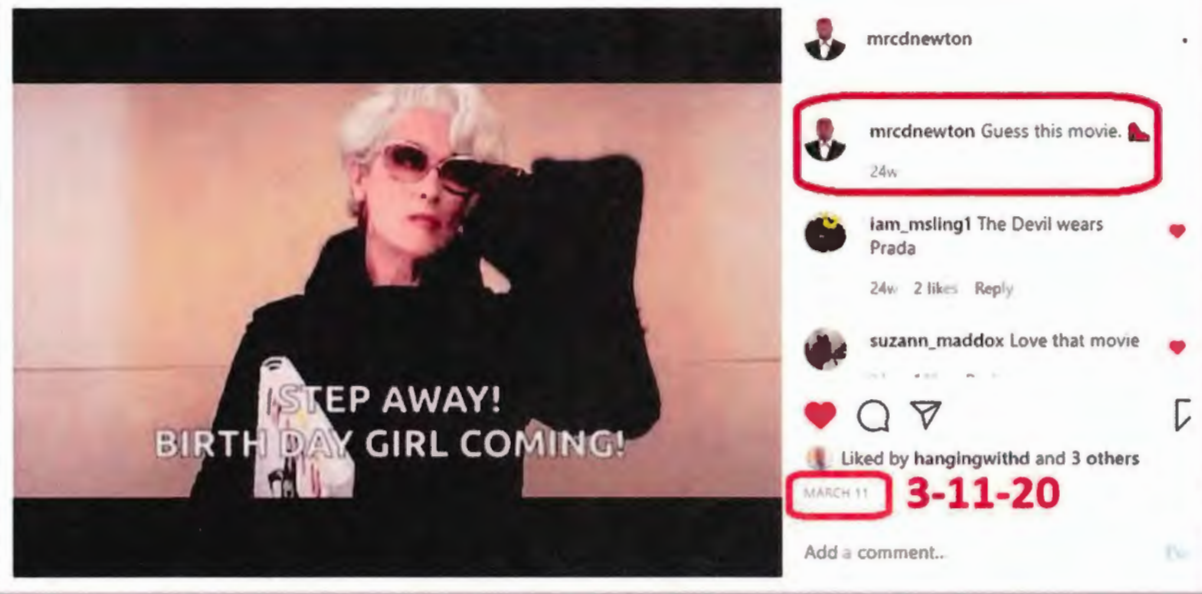
Director: **CD Newton**
Writers: **CD Newton**
Actors: **Kim Kardashian**
Kourtney Kardashian
Khloe Kardashian
Kris Jenner
Kendall Jenner

Related Stories

1/10/18 December 2017 Closes Out the Year with Record Grosses

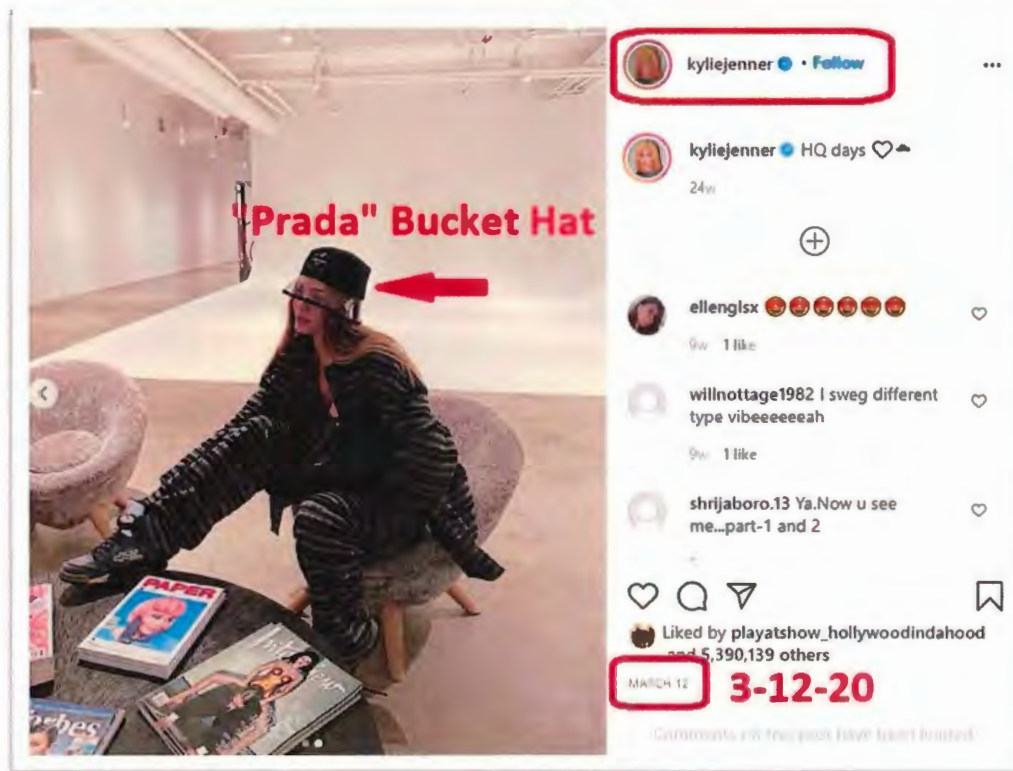
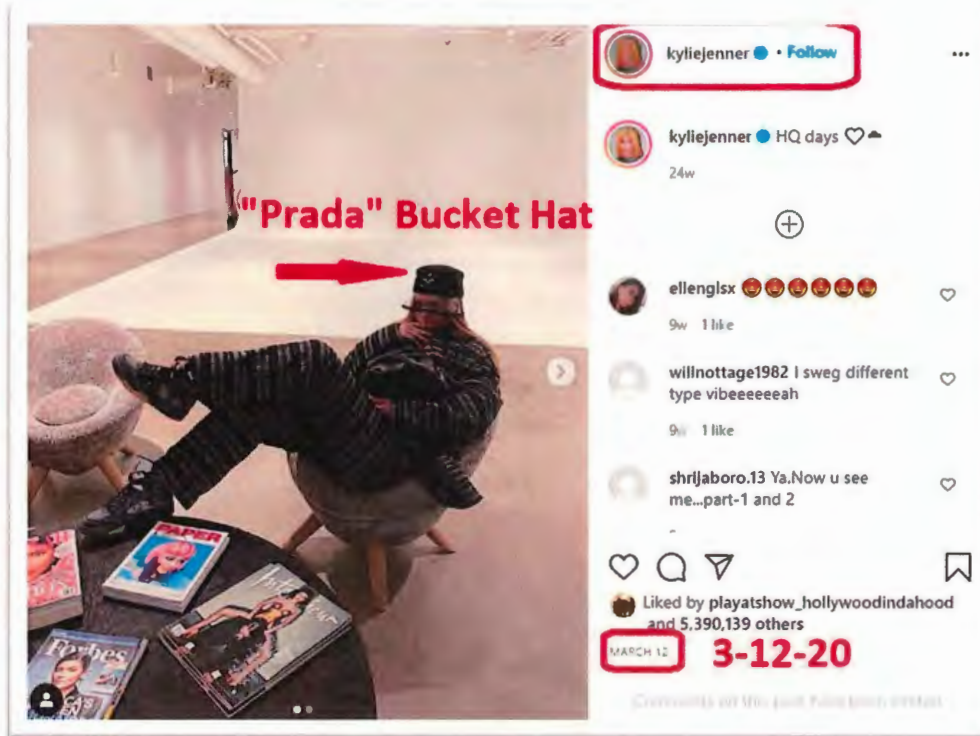
11/14/17 October 2017 Box Office Returned to the Year's Downward Trend

11/2/17 'Thor: Ragnarok' Targets \$100M+ Domestic Debut, Kicking Off the Holiday 2017 Season



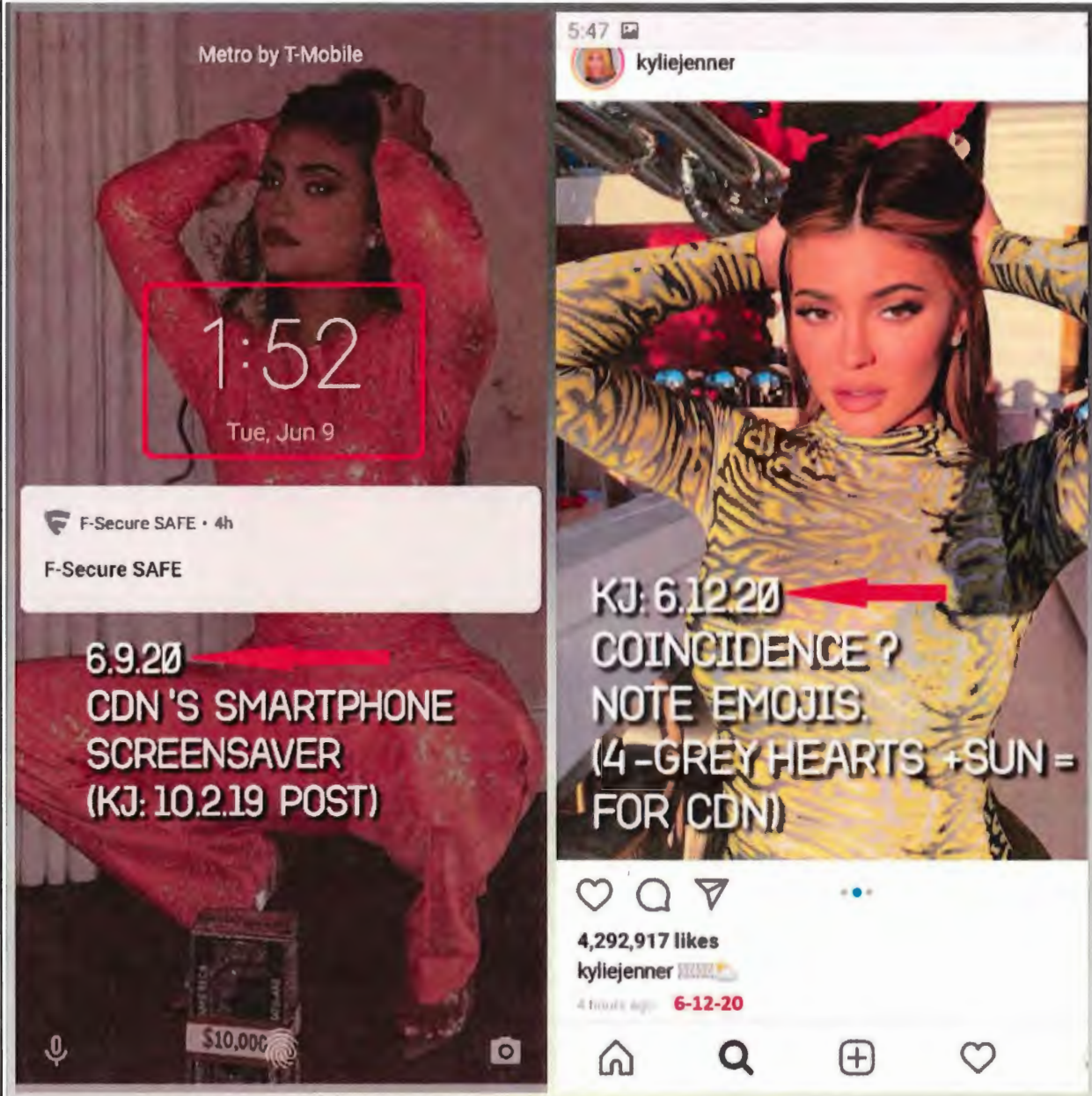
VI. CYBERSECURITY/CYBERSTALKING

44. However, a short time later Mr. Newton noticed suspicious activities that suggested to him cybersecurity (hacking) and cyberstalking.
45. To test his suspicion, on March 11, 2020, Mr. Newton posted to his Instagram page an image of actress Meryl Streep. A scene from the movie “The Devil Wears Prada.” He captioned: “Guess this movie?”
46. His followers responded with the correct answer. On March 12, 2020, KYLIE JENNER on her Instagram page appeared to *cryptically* respond also. She donned a *designer bucket hat* with the word “PRADA” conspicuously on the top black portion of the hat with a plastic flared-out bottom.



1 47. Again, to test his suspicion Mr. Newton applied a previous Instagram photo (10/2/19) of
2 Kylie Jenner as a screensaver to his SMARTPHONE on June 9, 2020. Jenner has a
3 distinct pose where her bent arms are uplifted and her hands behind her head.
4

5 48. On June 12, 2020, Kylie Jenner posted to her Instagram page a photo in a very similar
6 pose. The latter action strongly suggested hacking.
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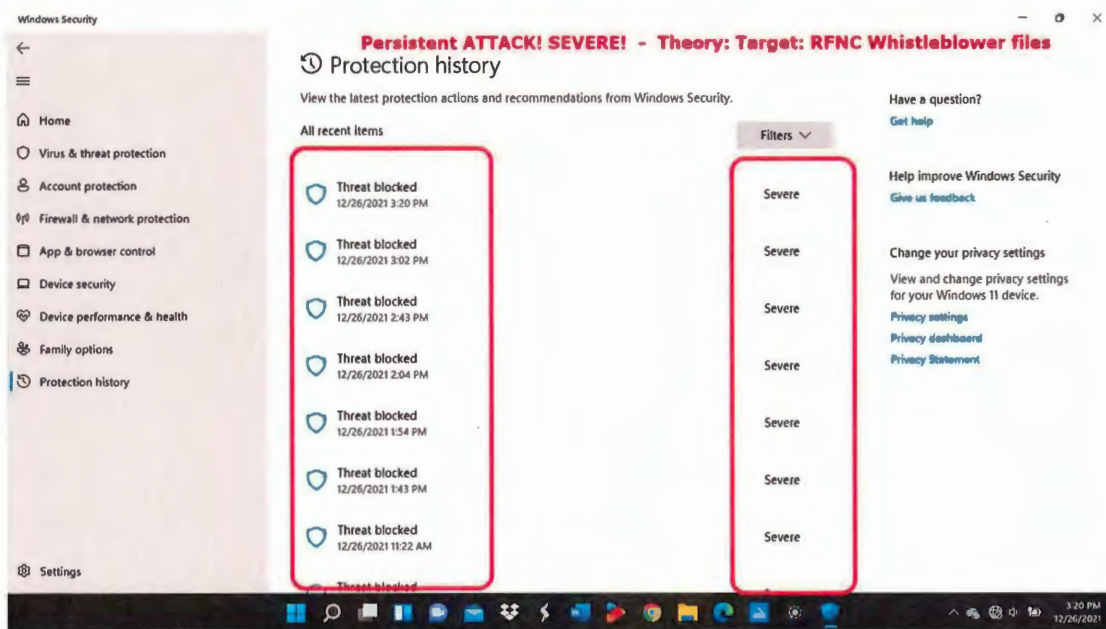
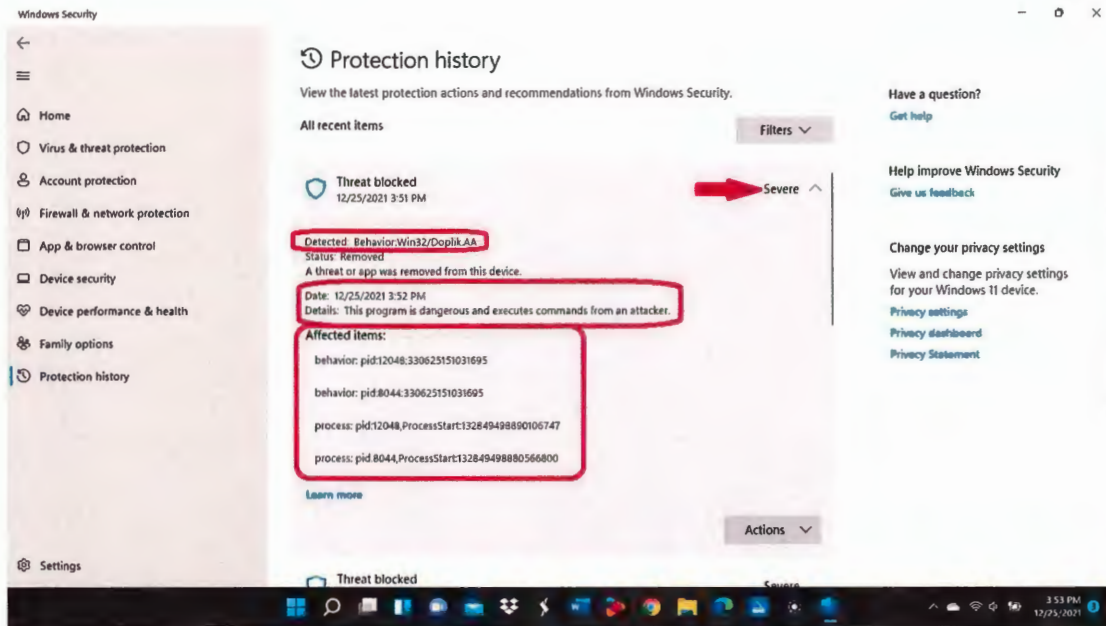


Left: Mr. Newton's smartphone 6/9/20

Right: Defendant Kylie Jenner's Instagram 6/12/20

VII. MICROSOFT WINDOWS DEFENDER ANTI-VIRUS

49. On December 25 & and 26, 2021, Microsoft Windows Defender Anti-virus found and removed MULTIPLE MALWARE attacks on Mr. Newton's laptop. They are described as "severe" and "dangerous." *"This program is dangerous and executes commands from the attacker."*



50. Mr. Newton continued to see this cybersecurity pattern. *A before and after contextual timeline* pattern between himself and the Defendants.

VIII. CIVIL ACTION LA SUPERIOR COURT

51. On July 2022, Mr. Newton filed a CIVIL ACTION LAWSUIT against the Defendants in LOS ANGELES SUPERIOR COURT. For cybersecurity-related offenses.
52. Discovery, written Interrogatories, and Request for Admissions Set No. 1 resulted in *subornation of perjury* by the Defendants Kardashians, Jenners, and their attorney.
53. Their Counsel initially answered all the questions and returned the written discovery to the Plaintiff *unsigned* (as required per Cal statute) by each Defendant.
54. Mr. Newton requested a Judicial Notice. Before the Court responded Defendants' Counsel hastily obtained their signatures *after the due date*. Furthermore, the answers remained precisely the same. Sadly, under the Cal statute, the Court erred in its discretion.

IX. "PEOPLE COME UP MISSING" – DEFENDANT K. WEST

55. On or around mid-December 2022, Defendant Kanye West aka Ye, said to Paparazzi on camera, "*People are sacrificed*. My mother was sacrificed. Around Hollywood *"a lot of people come up missing."* – YouTube/The Shade Room.



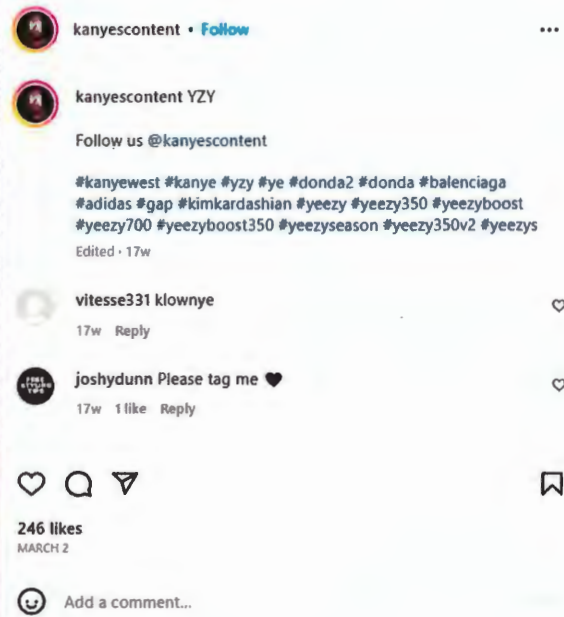


56. On or around December 10, 2022, Mr. Newton moved away from California.

57. On December 13, 2022, Newton filed a motion to "Voluntary Dismiss without Prejudice," the lawsuit.

X. CRYPTIC MESSAGES: DEFENDANTS' INSTAGRAM POSTS

58. On or around March 2, 2023, Defendant Kanye West aka Ye, had posted to Instagram a faceless image of himself appearing as a *fisherman*.

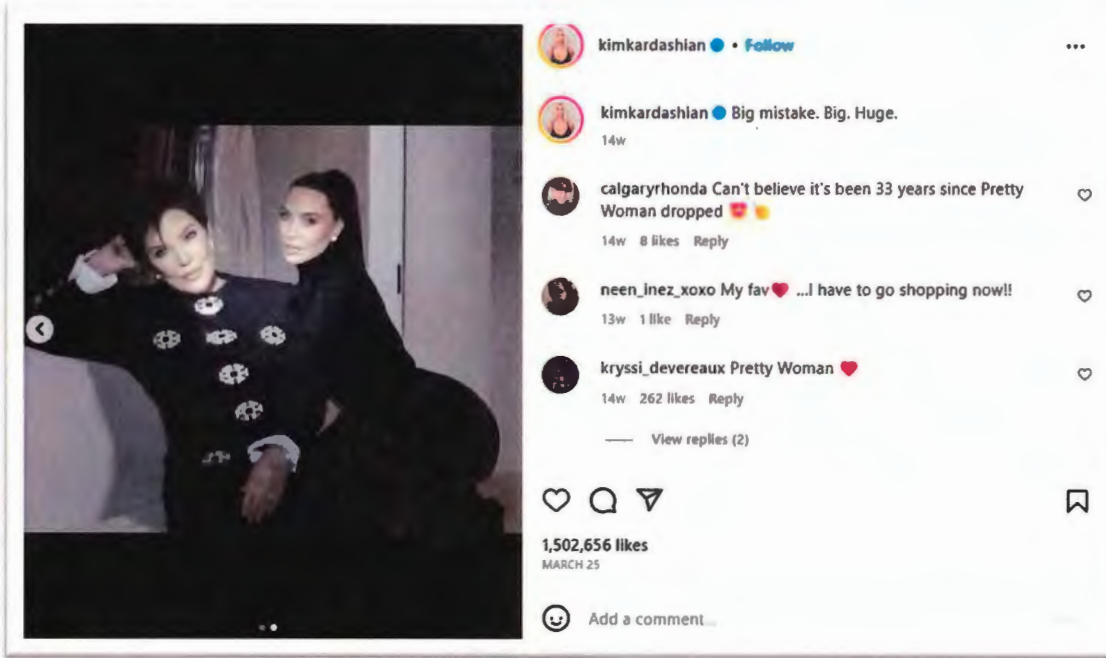


59. On March 16, 2023, the Court granted the “Motion to Voluntary Dismiss without Prejudice.”

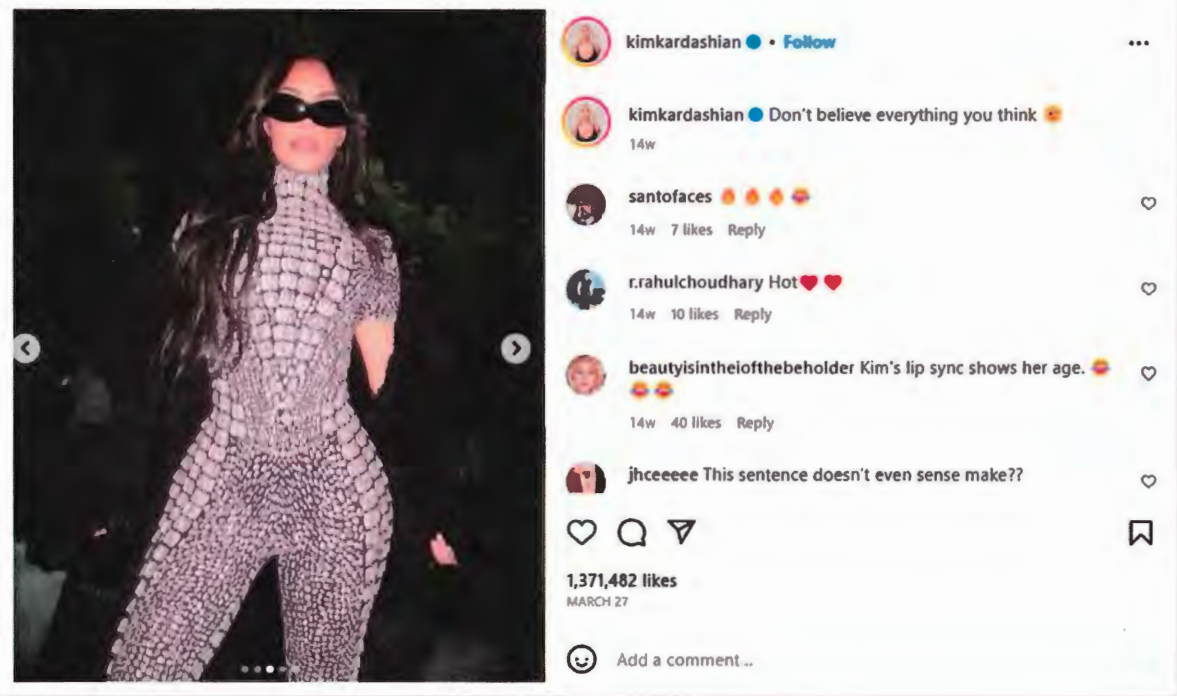
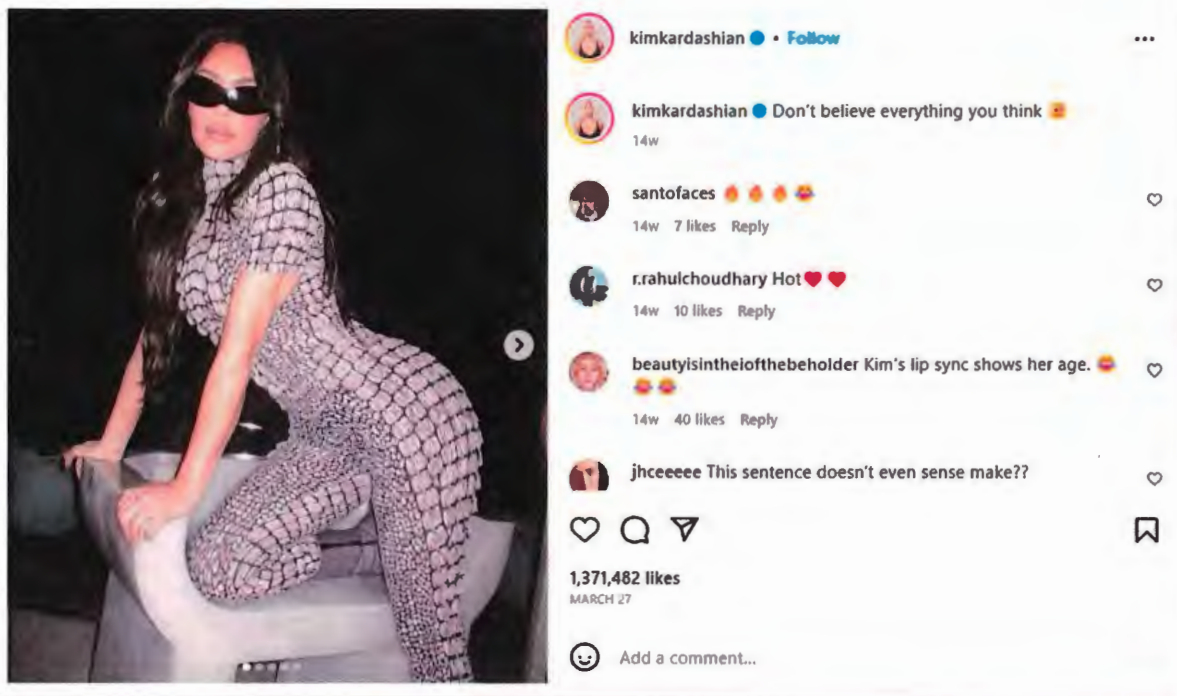
60. On or around March 25, 2023, Defendants Kim Kardashian posted to Instagram a series of photos (2) of herself and her mother. In black attire. Captioned: “BIG MISTAKE. BIG HUGE.” It was a direct quote from the movie PRETTY WOMAN (1990). (One of Mr. Newton’s favorite movies) It was the movie's 33rd anniversary.



61. In The second photo Defendant Kim Kardashian and Defendant Kris Jenner's faces are illuminated. They're also poised as the Performing Arts mask *Comedy and Tragedy*. - "When used together the two-drama masks are a symbol for *theater*." - The Fascinating Story of the Comedy and Tragedy Mask – Theater History – June 30, 2021.



62. On March 27, 2023, (A week after Mr. Newton's dismissed civil action) Defendant Kim Kardashian posted a series (3) of photographs of herself.
63. She donned a distinct one-piece short-sleeve outfit where the fabric resembles *fish scales*. Kardashian also wore a pair of *shades* or sunglasses although it is night-time. Her right knee is placed upon what appears to be an *oblong chair* that resembles a boat while standing on her left leg and leaning on one side of the chair. Caption: "Don't believe what you think." – Followed by a "wink emoji."
64. In the third and final image of the series Defendant Kim Kardashian appears standing and facing forward. She donned shades and *a fur coat draped around her shoulders*.



65. (On December 19, 2017, Mr. Newton posted to Instagram an image of his girlfriend Vernice L. Crutcher's funeral program. It depicted her with a *fur coat draped around her*

1 *shoulders. Captioned: “Tragedy has befallen you yet again. RIP Vernice L. Crutcher.”*

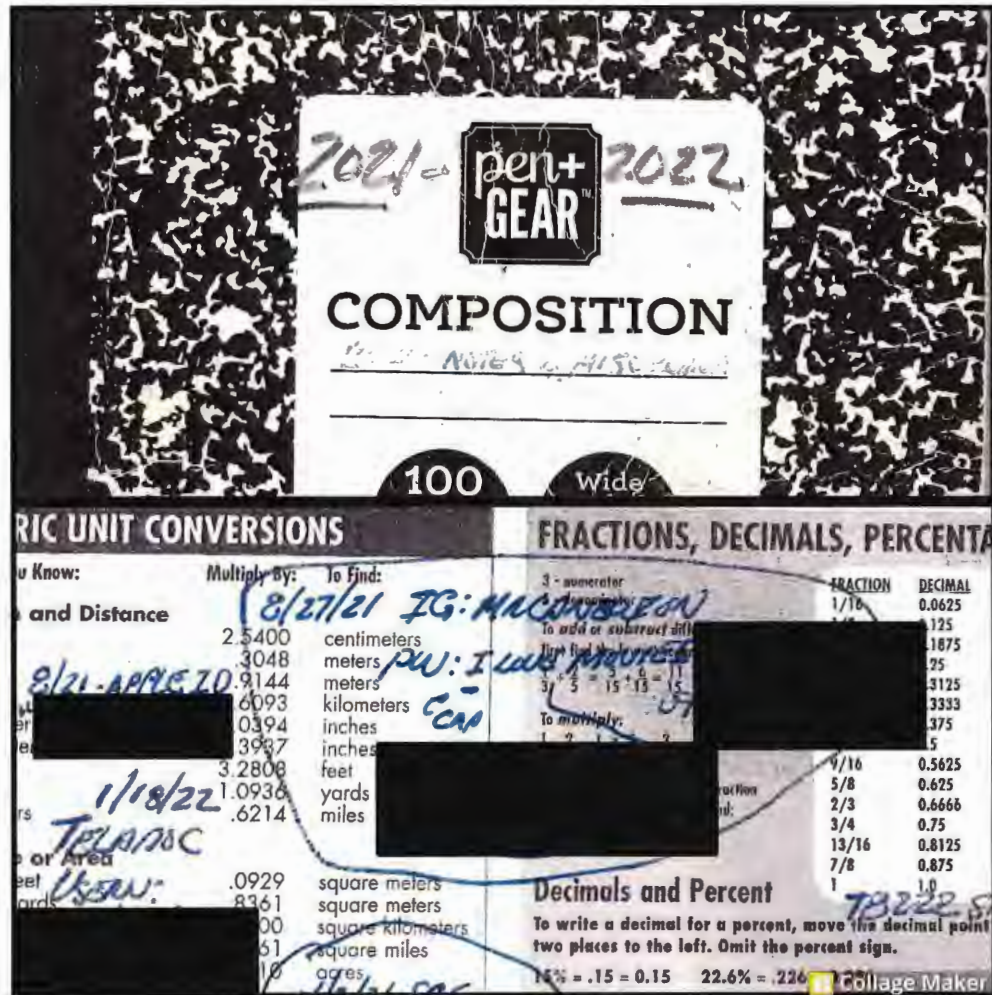
2 Followed by broken heart, sadness, and praying hands emojis.)



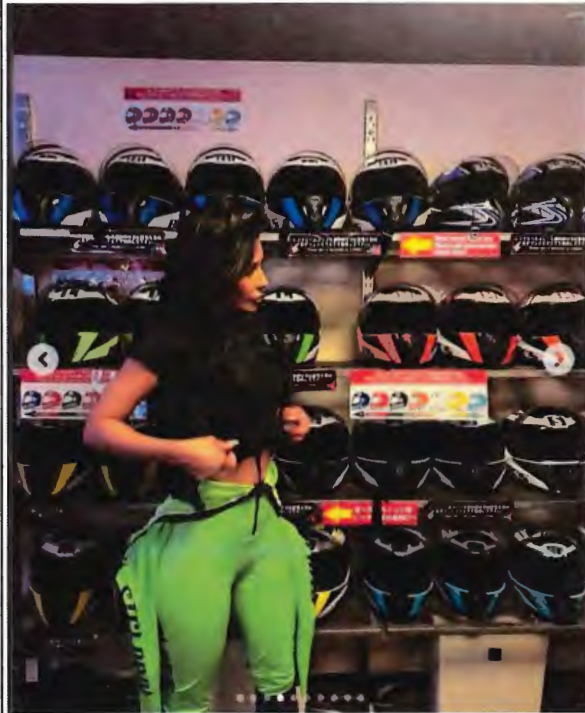
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16 **XI. Kim Kardashian’s April 2023 Incriminating Instagram Posts**

- 17 66. (On *August 27, 2021*, “*I love movies******” Mr. Newton’s *Instagram password* as
- 18 written in his “2021-2022 Composition Notebook”)
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67. On April 3, 2023, Kim Kardashian posted to IG a large red circle against a black background. Captioned: "JP" Followed by a heart emoji. This indicated she was in Japan.



68. Kardashian posted to IG a series of photographs of herself in Tokyo, Japan, while at a Bumper Cars amusement facility. She has on a black short-sleeve top along with lime or neon green pants. Captioned: “**Fast And Furious*” followed by an emoji race car. **Fast and Furious* is a “*movie*” reference.
69. (For months previously, Mr. Newton’s IG profile photo features him donned in an *olive-green suit, black shirt*, with olive green tie.)
70. On April 4, 2023, as part of the series, Kim Kardashian, displays a photograph of an *empty bumper car number 14*.



71. April 14, 2023, was the last day TLC's mother AGNES COLEMAN saw her son.
72. On April 14, 2023, Kim Kardashian, posted to IG, a series of photographs captioned: "Train Rides to Bamboo the *forest* in Kyoto." Emphasis added.



73. To the north of TLC's street (Beersford Avenue) is Louis Stokes Train Station. To the south is *Forest* Hill Park. The latter contains a *Boat* House and a Baseball *Diamond*.

-

75. (**Livor Mortis** begins appearing as dull red patches after 20 to 30 minutes from the time of death. Over the next 2 to 4 hours, the patches come together to form larger areas of

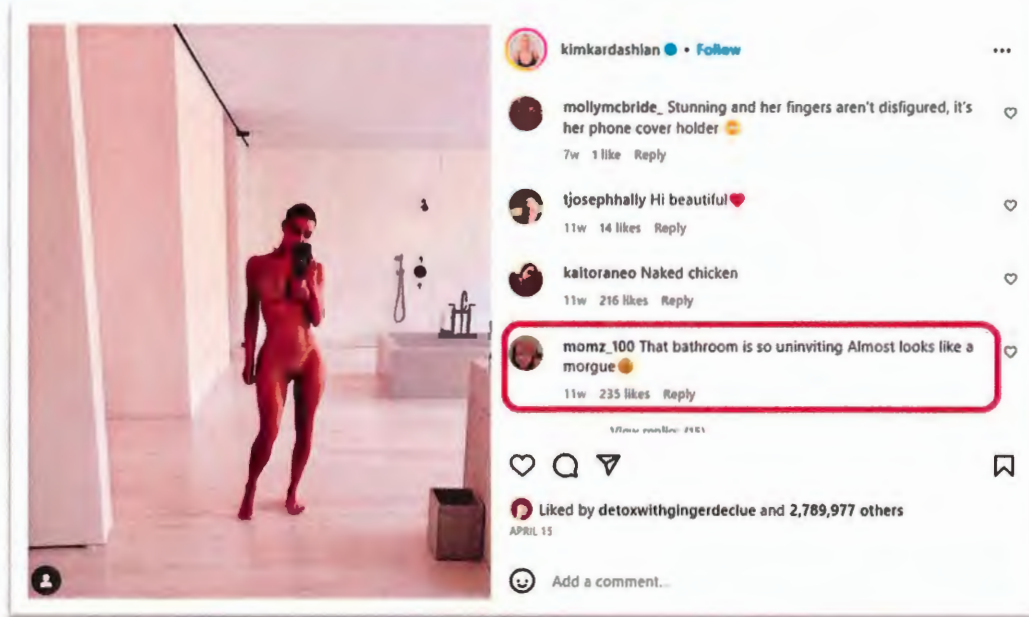
bluish-purple discoloration.”- Livor Mortis What it is, Occurrence, and More Author Lily Guo) – Emphasis Added

76. (“The fourth stage of decomposition, Livor Mortis translates to “*blueish color*” [livor] “of death” [mortis.] Livor Mortis begins within 20 minutes to 2 hours of death and initially causes the skin to appear *blue* and blotchy.) - The Post-Mortem Post: Marbling in a Dead Body) – Emphasis Added

77. On April 14, 2023, Kim Kardashian, posted to IG a man costumed as a covered face *Ninja* armed with a *sword aimed downward* at an imaginary foe.



78. On April 15, 2023, Kim Kardashian posted to IG a photograph of herself in *nude-colored* underwear or bikini. No caption. It appears that she is standing in a *morgue*. One person commented: “That bathroom is so uninviting. Almost looks like a *morgue*.” – “235 Likes.”



79. On April 15, 2023, Mr. Newton's first cousin TLC disappeared.

80. (On April 16, 2023, "date of death: approximate" by Cuyahoga County Medical Examiner David Dolinak)

| Ohio Department of Health VITAL STATISTICS CERTIFICATE OF DEATH | | | | | | | | | | |
|---|---|------------------------------|------------------|---------------------------------|-----------------|--|--------------------------------|--|---|--|
| Primary Reg. Dist. No. 1801 | | | | State File No. 2023044870 | | | | | | |
| Registrar's No. 1800-2023005375 | | | | | | | | | | |
| DECEDENT | 1. Decedent's Legal Name (First, Middle, Last, Suffix) (Include AKA's if any) | | | | | | 2. Sex | | 3. Date of Death (Mo/Day/Year) | |
| | THADDEUS LAWRENCE COLEMAN | | | | | | MALE | | APRIL 16, 2023 APPROXIMATE | |
| | 5a. Age (Years) | | 5b. Under 1 Year | | 5c. Under 1 day | | 6. Date of Birth (Mo/Day/Year) | | 7. Birthplace (City and State or Foreign Country) | |
| | 33 | | Months | | Days | | MAY 02, 1989 | | CLEVELAND, OHIO | |
| | 8a. Residence State | | 8b. County | | | | 8c. City or Town | | | |
| OHIO | | CUYAHOGA | | | | EAST CLEVELAND | | | | |
| 9a. Ever in US Armed Forces? | | 9b. Ever in US Armed Forces? | | | | | | | | |
| NO | | NO | | | | | | | | |
| 10. Marital Status at Time of Death | | | | | | 11. Surviving Spouse's Name (If wife, give name prior to first marriage) | | | | |
| NEVER MARRIED | | | | | | | | | | |
| 12. Decedent's Education | | | | 13. Decedent of Hispanic Origin | | 14. Decedent's Race | | | | |
| BACHELORS DEGREE (E.G., BA, AB, BS) | | | | NO | | BLACK | | | | |

81. On April 16, 2023, Kim Kardashian posted to IG a series of photographs (2) of her daughter, North West, costumed as actress Janet Jackson from the movie Poetic Justice (1993). Captioned: "*Poetic Justice.*" Emphasis added.

82. (Poetic Justice: An outcome in which vice is punished and virtue rewarded usually in a manner peculiarly or ironically appropriate. Synonyms: Punishment, *revenge*, and *retaliation*. – Merriam-Webster Dictionary.)
83. North West has a *silver choker* around her neck. She also has a glass with a *red-colored beverage* in hand. (*Redrum* is murder spelled backward).
84. (Like a *drowned* individual, a ‘choked’ victim *can’t breathe* and take in vital oxygen to the brain and heart.)



85. North West also, has on a t-shirt that featured Marilyn Monroe in a scene from the movie: “Gentlemen Prefer Blondes.” (1957) The scene Ms. Monroe is singing: “*Diamonds* are a Girl’s Best Friend.”

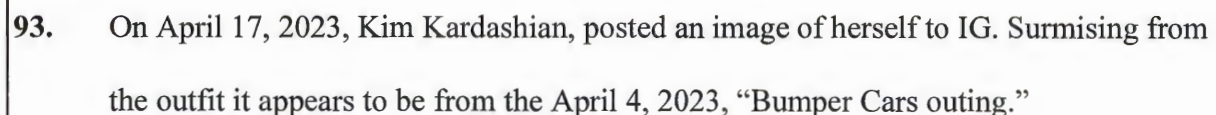


86. The “*diamond*” inference is to the infamous episode, Season 6, August 2011, of KUWTK, where then boyfriend Kirs Humphreys tossed Kim Kardashian into the Bora Bora *ocean*, and she lost a diamond earring. Kim Kardashian panics and Kourtney Kardashian, her sister famously said, “Kim, there are *people dying*.”) Emphasis added.
87. On or about April 15, 2023, TLC’s friends found his abandoned car in Forest Hill Park.
88. On April 17, 2023, Kim Kardashian posted to IG a series of photographs customized as actress Uma Thurman from the *movie KILL BILL*.
89. She donned a black and yellow jacket with black biker pants. A quote from the movie served as the caption. “*You and I have unfinished business.*” Followed by what appears to be EMOJI representing SUSHI. The location: “*Kill Bill resto bar.*” Emphasis added.
90. “Kill Bill” by Quentin Tarantino is a famous *revenge movie*.

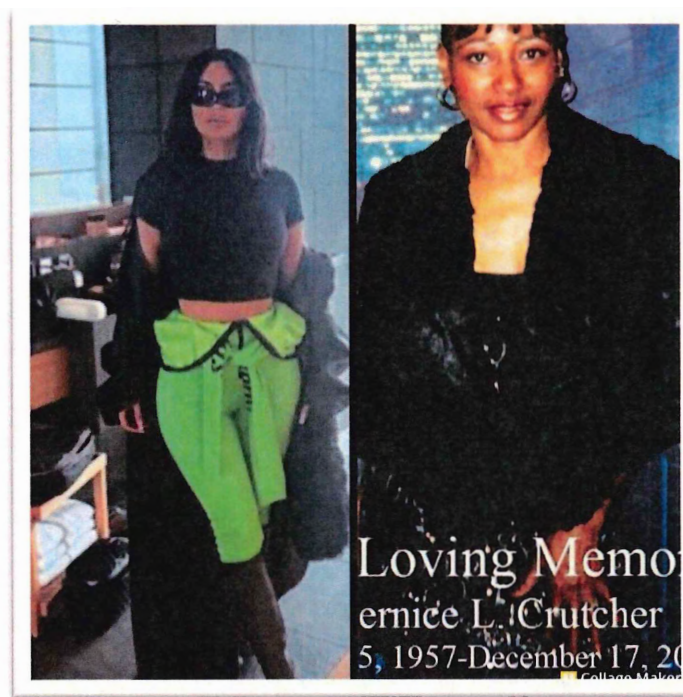


91. In one photo of the series Kim Kardashian appears on an upper level above the crowd. Her left foot *resting (R.I.P.?)* between the rail and her chin resting on her uplifted right hand. She donned shades.





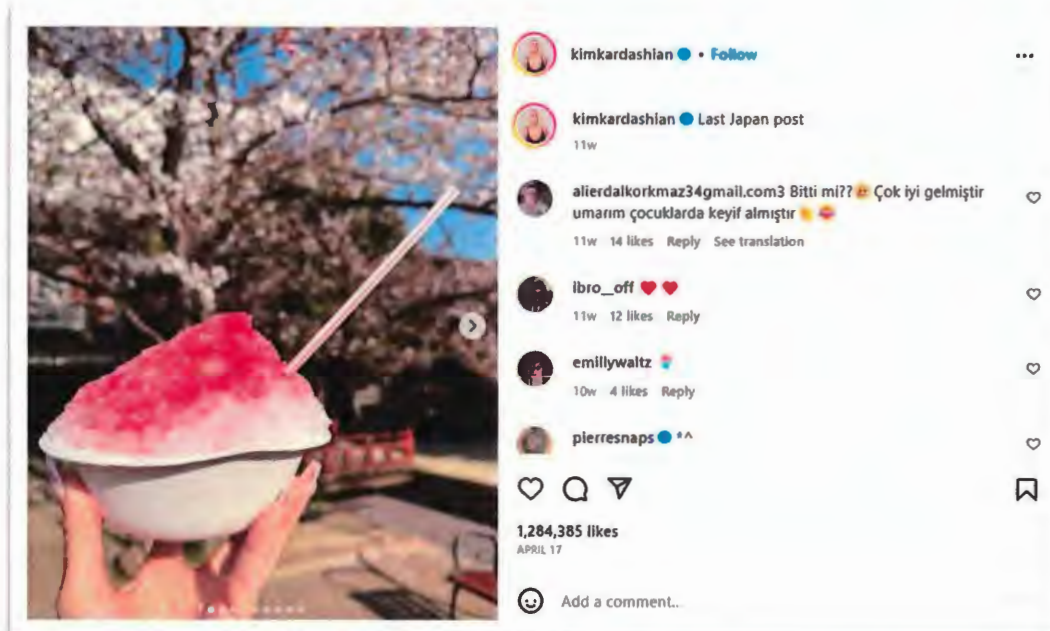
94. In this IG post, Kim Kardashian has on shades and a fur coat draped behind her. She stands directly in front of a **black block wall**.
95. This image is very similar to the murdered Vernice Crutcher's (Mr. Newton's girlfriend) December 2017, funeral program cover photo posted to Instagram.
96. Ms. Crutcher also poses in front of a **black skyscraper or building** in the backdrop. Also, conspicuously Ms. Kardashian has her legs **crossed**.
97. (Typically to "cross" out means to delete or cancel.)



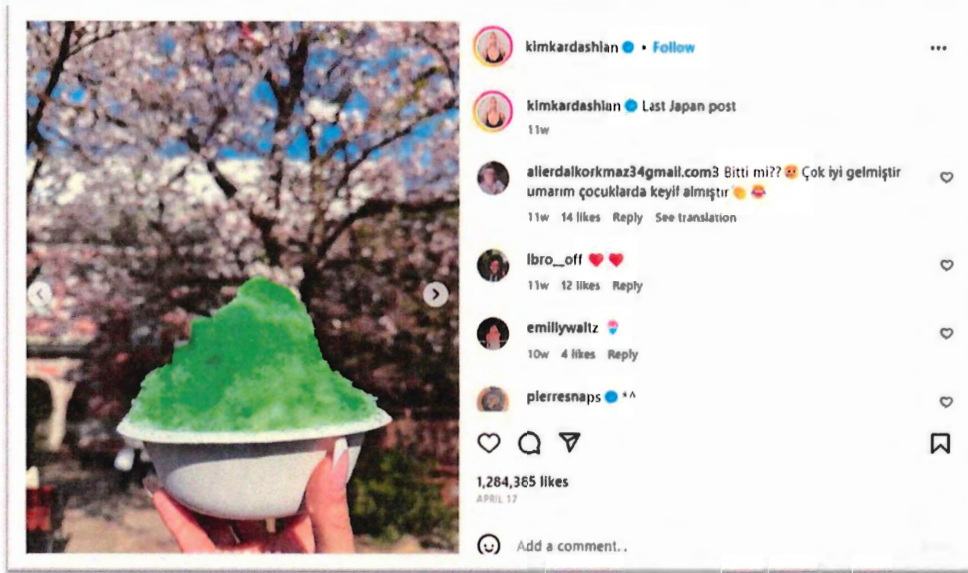
98. On April 17, 2023, Kim Kardashian posted to IG a series of photographs with captioned: "Last Japan post."
99. (Typically, a **deceased person** has a "last post" on social media)
100. In one photo, donned with the bulging blue shades and vibrant blue full-length outerwear, she has a straw in her mouth while enjoying ice slurpy covered with red flavoring. The red-flavored ice is inside a container that resembles a **"boat."**



101. In a subsequent photo on the same date, Kim Kardashian uplifts the *red-flavored* ice slurpy in front of a tree. A close-up of her left hand holding the red-flavored ice in the *boat-like* container appears in the photograph.



102. In a subsequent photo on the same date, Kim Kardashian uplifts the *green-flavored* ice slurpy in *front of a tree*. A close-up of her right hand holding the green-flavored ice in the *boat-like* container appears in the photograph. *NO straw* appears in this image.



103. (“Your body is not a pretty sight after 19 days in the water. Things like *greening and marbling* of the skin occur in other parts of the body... the *head becomes bloated*, and the *eyes bulge out*.”) – How Long Does It Take a Drowned Body to Float? –

TeachersCollegesj - May 14,2020

104. Kim Kardashian’s uplifted hand before a tree also resembles or appears as a representation of *Cleveland Metroparks’ logo or trademark*.



105. On April 29, 2023, a *fisherman* recovered Thaddeus Lawrence Coleman's body from Lake Erie. *At Cleveland Metroparks East 55th Street Marina around 3:30 a.m.*

- [Wikipedia](#) [History](#) [Talk](#) [View source](#) [Recent changes](#) [Help](#)

I Know What You Did Last Summer (franchise)

| | | | |
|--|-----------------------|---------------------------------|--|
| List Summer | White | Weiss | H. Moritz |
| Untitled fourth film | IBA | Jennifer Kayton Reiserson | Leah McKendrick Neal H. Moritz |

"fisherman begins stalking the friends."

I Know What You Did Last Summer (1997) [edit]

Main article: *I Know What You Did Last Summer*

After an accident on a winding road, four teens make the fatal mistake of dumping their victim's body into the sea. But exactly one year later, a mysterious fisherman begins stalking the friends.

I Still Know What You Did Last Summer (1998) [edit]

Main article: *I Still Know What You Did Last Summer*

The murderous fisherman with a hook stalks the two surviving teens, Julie James and Ray Bronson who left him for dead. Despite Julie's warnings, her friends do not believe her until it is too late, and the fisherman begins a second murder spree at a posh island resort in the Bahamas.

I'll Always Know What You Did Last Summer (2006) [edit]

Main article: *I'll Always Know What You Did Last Summer*

A group of teenagers in Colorado find themselves being stalked and killed one by one by a mysterious figure with a hook, exactly one year after they covered up a friend's accidental death.

Untitled fourth film [edit]

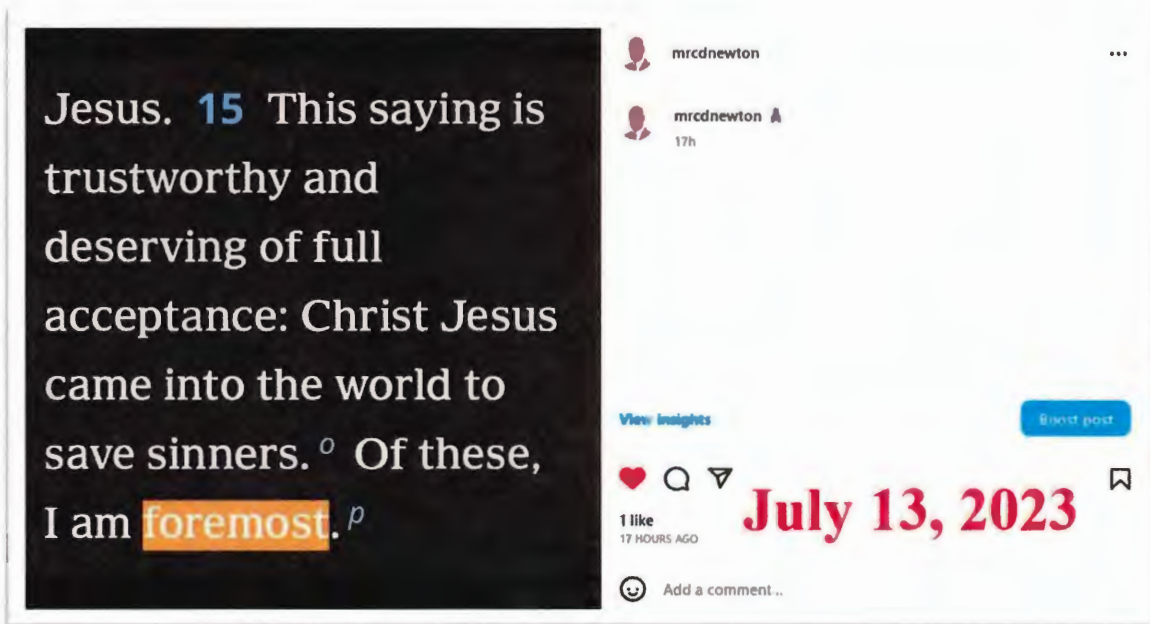
108. A “fisherman” seeks revenge on teenagers who thought they killed him. Again, it was a “fisherman” who recovered TLC’s remains from Lake Erie on April 29, 2023, around 3:30 p.m.

XII. THADDEUS L. COLEMAN'S DEMISE

109. On June 21, 2023, Death Certificate, Cuyahoga County Medical Examiner DAVID DOLINAK deemed Coleman's death: "Intentionally drowned self in Lake - SUICIDE."
(This determination was unbeknownst to Mr. Newton till later.)

XIII. THE SCRIPTURE CYBERTRAP

110. On July 13, 2023, Mr. Newton posted an out-of-the-ordinary post to Instagram. A scripture from the New World Translation. The first word: "JESUS."
111. (Jesus Christ famously said, "If you ask, you shall receive." – Matthew 7:7. – This was intentionally a cyberstalking trap)



112. On July 14, 2023, Mr. Newton fearing for his life takes an unscheduled flight from San Antonio, Texas, to Cleveland, Ohio. Reappearing after 5-years.

XIV. NEWTON AND LOCAL LAW ENFORCEMENT

113. On July 15, 2023, Mr. Newton provided a “**Voluntary Written Statement**” with the East Cleveland Police Department. He was told Detective James Marche was the assigned investigator.

114. It implicated the Defendants acted in “*retaliation*” and sent a “*warning and death threat*” by way of his first cousin’s death not to resume the civil action.

115. “*The risk is high.*” Mr. Newton mentioned in the Voluntary Written Statement provided to the East Cleveland Police Department.

East Cleveland Police Department14340 Euclid Avenue
East Cleveland, OH 44112Page 1 of 1Date 7/15/2023OCA# 23-01108**VOLUNTARY STATEMENT*****Please read carefully - FILING A FALSE STATEMENT IS SUBJECT TO PROSECUTION UNDER OHIO LAW.*****False Statement (O.R.C. 2921.13 A)** No person shall knowingly make a false statement, or knowingly swear or affirm the truth of a false statement previously made.***Making False Allegation of Peace Officer Misconduct (O.R.C. 2921.15 B)** No person shall knowingly file a complaint against a peace officer that alleges that the peace officer engaged in misconduct in the performance of the officer's duties if the person knows the allegation is false.Name: CHARLES D. NEWTON Address: [REDACTED]Date of Incident: 4 129 12023 Time of Incident: 3:30 (am/pm (circle one))

DETAILS: THADDEUS L. CULAMAN, 33, MY COUNSEL, RORY WELLS
 RETRIEVED FROM CMP ESS IN ST. MARINUS. THE CULPITS ARE THE *
 NAMED DEFENDANTS IN THE CIVIL ACTION LAWSUIT (22LBCV00090
 L.A. SUPERIOR. THIS HEINOUS CRIME WAS IN RETALIATION TO THE
 SUIT & DEPOSITIONS. ~~THE~~ I FILED THE SUIT AGAINST HIGH-PROFILE
 CELEBRITIES I DISCOVERED ENGAGING IN: CYBER SECURITY, CYBER
 ATTACKS (SMARTPHONES, LAPTOPS, NETWORKS) THE RISK IS HIGH. POTENTIAL
 DAMAGING FOR THEIR HIGH PROFILE CAREERS AND REPUTATIONS.
 ONE OF THE SUSPECTS SPIN DECEMBER 2022 TO PAMPAZZI, "PEOPLE
 ARE SACRIFICED AND COMES UP MISSING ALL THE TIME AROUND
 HOLLYWOOD." — PLEASE HAVE THE DETECTIVE CONTACT ME ASAP
 FOR MUCH MORE INFORMATION.

OFFICER SIGNATURE:

SIGNATURE:

Charles D. Newton

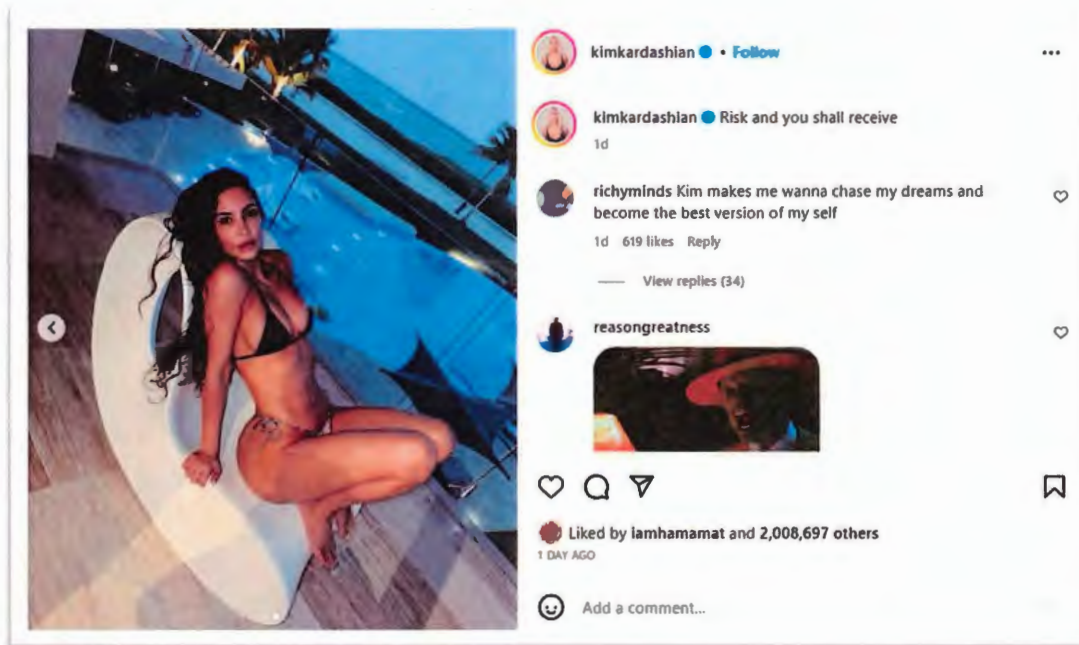
- 1 116. On July 16, 2023, Lt. Commander Detective DON SLYVUS sent Mr. Newton an email.
2 Stating availability for an interview between “10:00 am and 12:00 pm tomorrow.”
3
4 117. On July 17, 2023, Mr. Newton did an on-camera interview with the Cleveland
5 Metroparks Detectives CHRIS AUCKERMAN AND RICHARD VALEK for about an
6 hour.
7
8 118. He presented a “timeline video of evidence” about Defendant Kim Kardashian’s specific
9 Instagram posts about a month before and sometime after TLC’s demise.
10
11 119. Mr. Newton stressed to Cleveland Metroparks Detectives that Kim Kardashian’s IG posts
12 contain numerous *self-incriminating evidence for “probable cause.”*
13



XV. “RISK AND YOU SHALL RECEIVE”

120. On July 18, 2023, Defendant Kim Kardashian posted to her IG two photographs of herself captioned: *“Risk and you shall receive.”*
121. Defendant Kim Kardashian in the first photograph donned a bikini. She rests with an *outstretched arm to the viewer’s left*. Behind her is a pool. And just beyond the pool is what appears to be a *lake or ocean*.
122. Defendant Kim Kardashian in the second photograph; appears it have been rotated *northward*. Kim is now in a *floating pose*. Lake Erie is “north” of Cleveland, Ohio.





123. Mr. Newton viewed this image as a *veil death threat*.
124. Defendant Kimi Kardashian uses the same word (“*risk*”) from the “Voluntary Statement” left with the East Cleveland Police Department. But with a perverse twist on Jesus’s famous statement: “Ask, and you shall receive,” becomes “*Risk and you shall receive.*”
125. Mr. Newton perceived the “receive” to be the *threat of drowning* (hence the floating) in the lake or ocean in the background. A similar demise as his first cousin retrieved from Lake Erie earlier on April 29, 2023.
126. Mr. Newton perceived Defendant Kim Kardashian’s outstretched arm to the viewer’s left indicating pointing to the West as on a compass for CMPD-HQ Furthermore, the reclining position indicated “rest-in-peace.” Or someone deceased.

XVI. CONSPIRACY: LOCAL LAW ENFORCEMENT

127. This covert message demonstrated she was aware of his interview with Cleveland Metroparks detectives about her role in the demise of his first cousin TLC. Cleveland

Metroparks Detective Headquarters is located on Cleveland's *west side* in Fairview Park, Ohio.

128. Mr. Newton surmised based on Defendant Kim Kardashian's expedient reaction and veil death threat to his contacts with local law enforcement *they were all possibly complicit in the kidnapping and murder of his first cousin Thaddeus L. Coleman.*

129. Local law enforcement had unlawfully *shared* confidential information with Defendant Kim Kardashian. Resulting in her July 18, 2023, veil death threat at Mr. Newton.

XVII. NEWTON CONTACTS HIGHER AUTHORITIES

130. On August 10, 2023, Mr. Newton submitted an online E-TIP with the FBI: Cleveland. Section: "Murder-4-Hire." About the true cause of death and identified the perpetrators for his first cousin Thaddeus L. Coleman.

131. On August 22, 2023, Mr. Newton submitted to the *FBI Cleveland* and Ohio *Organized Crime Investigation Commission* a 16-page report via registered mail.

132. It provided detailed evidence of the Defendants' involvement in his first cousin TLC's demise. It also identified new death threats.

133. On September 3, 2023, Mr. Newton submitted via online a civil rights complaint to the *United States Department of Justice Civil Rights Division* – Inspector General.

FIRST CAUSE OF ACTION

(Violation of Computer Fraud and Abuse Act 18 USC §1030)

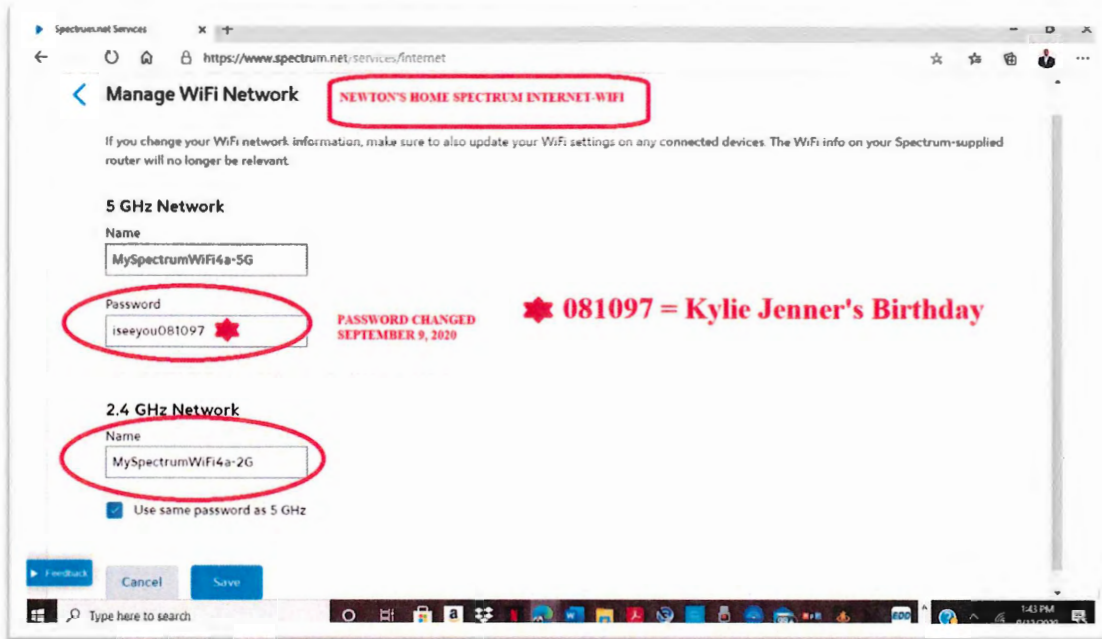
COMPUTER FRAUD (HACKING)

(as Against All the Defendants)

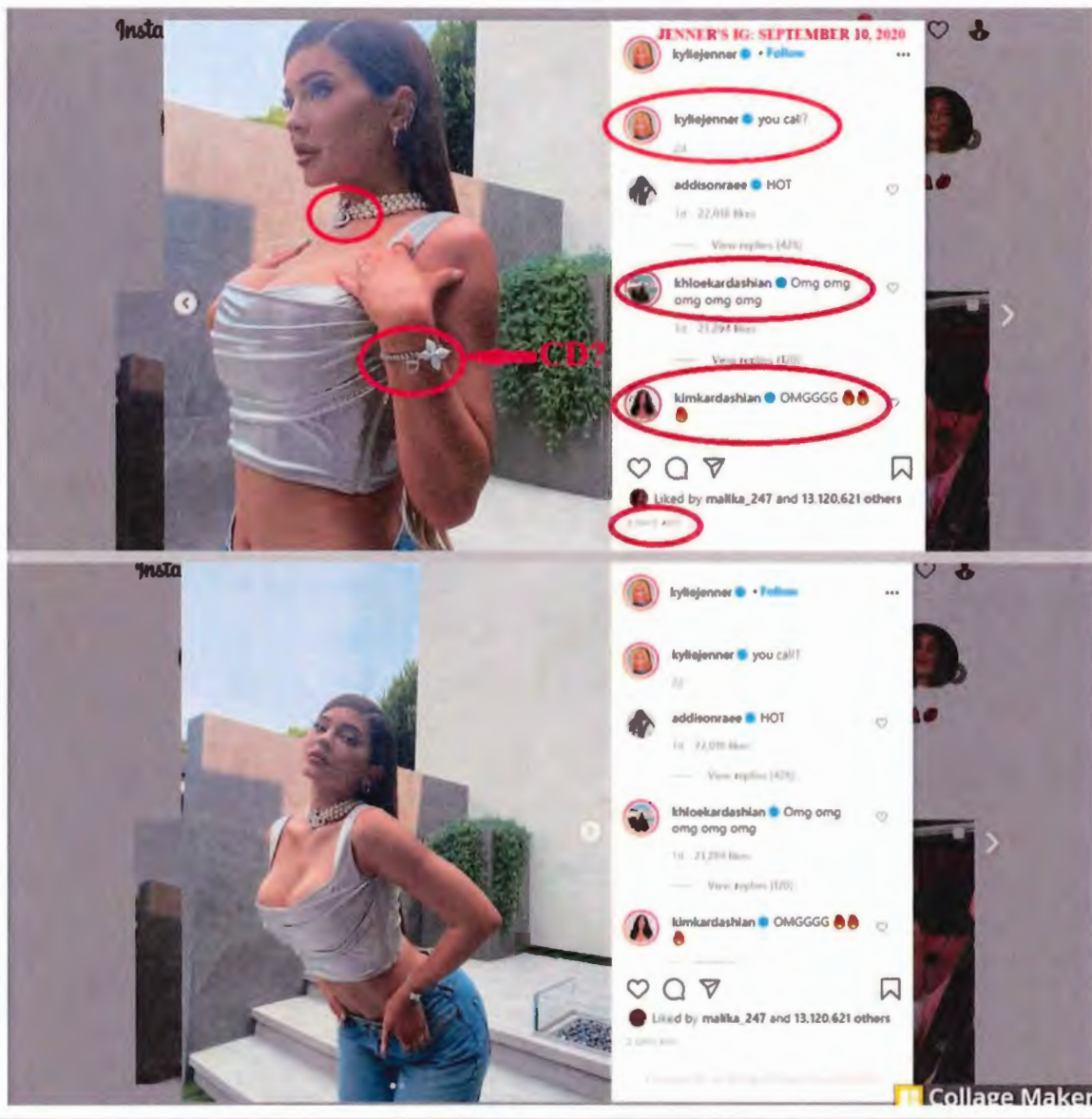
134. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.
135. (CFAA) “It establishes *civil liability* for anyone who intentionally *access a protected computer without authorization...*” (Emphasis added)
136. The Defendants have done so within the same state, interstate, and internationally.
137. On or about May 22, 2020, Kourtney Kardashian-Barker posted to Instagram a series of photographs of herself seated inside a shower wearing a green leather coat and wearing off white colored pants.
138. The timing of the post, her collective gestures, Mr. Newton perceived to contain a hidden message. At the time he was drafting a civil action complaint on his laptop. A backup copy was saved to a flash drive. The flash drive color scheme was very similar to Defendant Ms. Kardashian-Barker’s attire.
139. In one photograph she tugs at her lapel. Indicating to pull out the flash drive and discontinue drafting the civil action complaint. The shower location covertly implies *washing or getting rid of our family dirt down the drain.*



140. On September 9, 2020, Mr. Newton intentionally changed his home internet password to: "iseeyou081097." *The digits are Defendant Kylie Jenner's birthday.* A cyber trap.



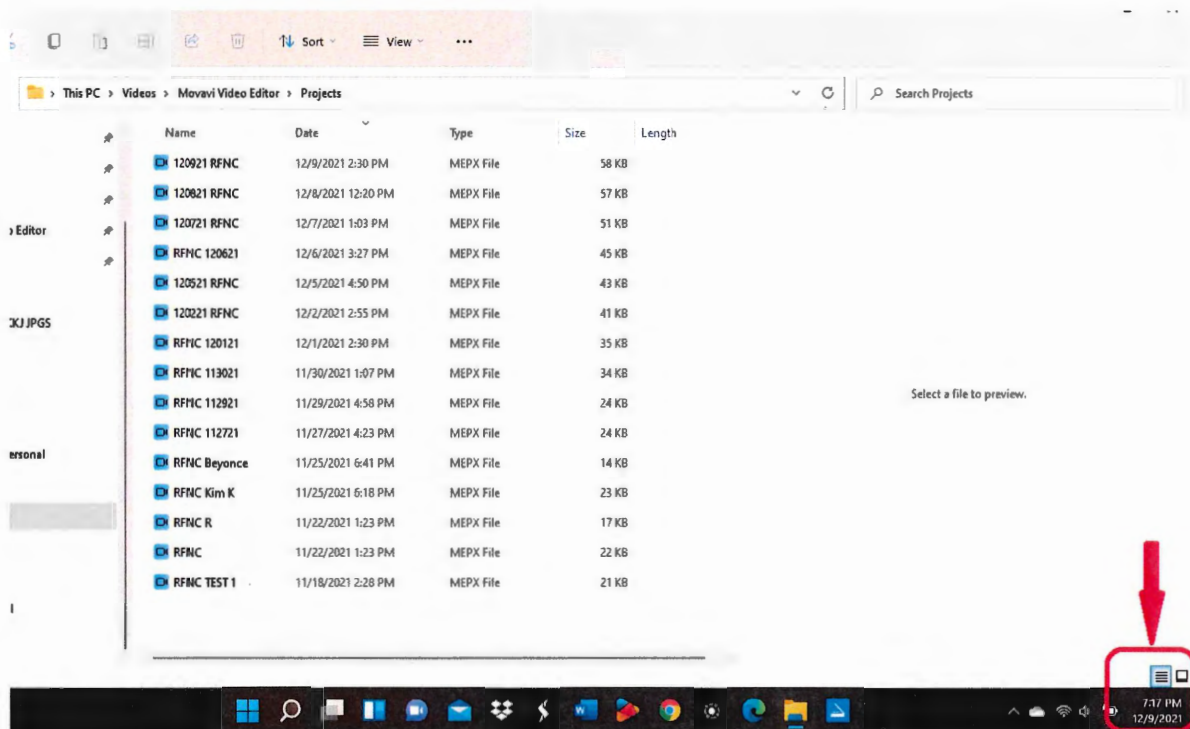
141. On September 10, 2020, Ms. Jenner posted to her Instagram a series of photographs of herself. She was dressed in a silver-grey crop top and blue jeans. On her wrist is a bracelet with the letters “CD” (Christian Dior also Mr. Newton’s initials) Captioned: “*You call?*” Ms. Jenner has responded to Mr. Newton’s home internet password with *her birthdate covertly included*. She and (hackers) were privileged to this fact again facilitated by cybersecurity.



142. On December 8, 2021, Mr. Newton was producing on his laptop a whistleblower YouTube documentary. It was untitled. It was till then labeled, “RFNC.” (Rich, Famous, and NO Consequences) – High profile celebrities engaging in cybersecurity and cyberstalking.
143. On December 8, 2021, Defendants Beyonce Knowles-Carter and Sean Carter aka Jay-Z jointly posted to Ms. Carter’s Instagram page a series of photographs. Ms. Carter donned

a designer silver-colored pantsuit with sunglasses. The two-piece suit designers' names: "Gucci and Balenciaga." It means ***"The Hacker Project."*** Mr. Carter has on a black leather jacket also with shades. However, he conspicuously has his mouth covered by his hands in the form of an "X." In the next photograph, they each have uplifted hands in the shape of Mr. Carter's well-known symbol of a ***"diamond."*** Also, he has his legs ***crossed.***

144. The timing, their gestures, and Ms. Carter's designer suit's covert meaning ("The Hacker-Project") indicate their knowledge, disapproval, and intimidation of Mr. Newton's YouTube documentary "Rich, Famous, and NO Consequences" (RFNC). The couples' joint Instagram post is tangible evidence of cybersecurity (hacking) or Computer Fraud.



google.com/amp/s/www

HOMEPAGE
GUCCI AND BALENCIAGA'S THE HACKER PROJECT IS
FINALLY HERE THESE ARE OUR TOP PICKS

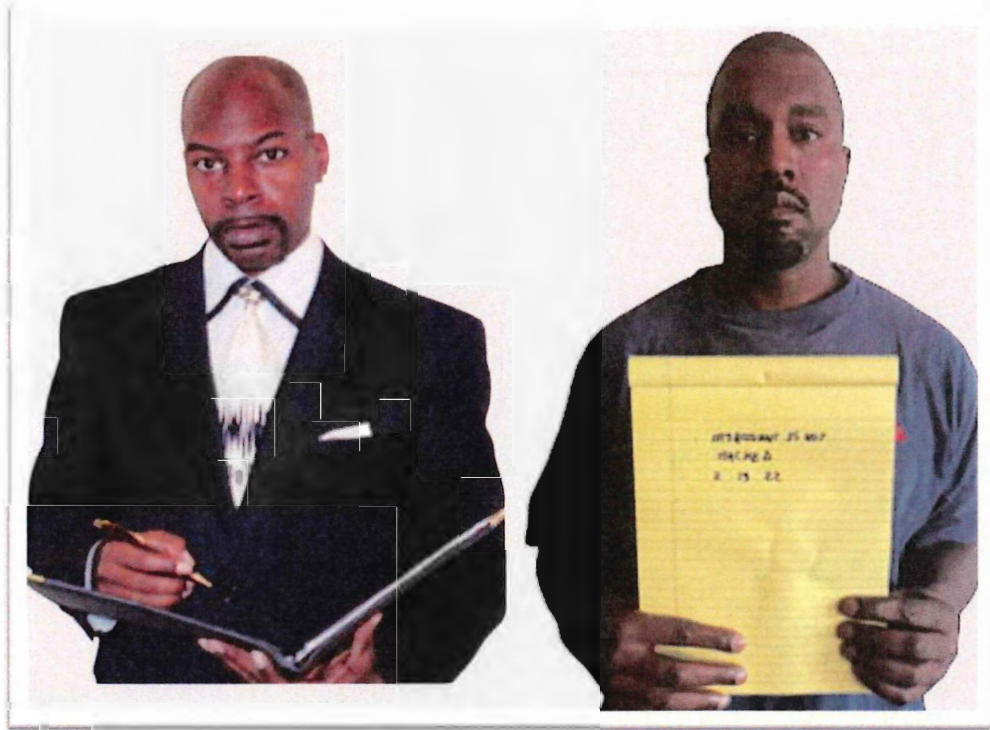
Gucci And Balenciaga's The Hacker Project Is Finally Here. These Are Our Top Picks

PAMEYLA CAMBE | PUBLISHED :
NOVEMBER 18, 2021 11:00 AM



145. On February 19, 2022, Defendant Kanye West aka Ye, posted to Instagram a photograph that mimics Mr. Newton's image of himself holding a legal pad holder and a pen. Also, mocks Mr. Newton's chronological documentary evidence. Mr. West holds a legal pad facing forward toward the camera. Captioned: *"My account is not hacked 2-19-22."* This image and caption are intended to deny Mr. Newton's claims of cybersecurity (hacking). However, as previously mentioned on December 25th and 26th, 2021, Microsoft Windows

1 Defender identified numerous "*dangerous and severe malware*" attacks on Mr.
2 Newton's laptop.
3



SECOND CAUSE OF ACTION

COPYRIGHT INFRINGEMENT

(17 USC § 506 (a))

(Against Kanye West aka Ye, Kim Kardashian, Kylie Jenner & Beyonce Knowles-Carter)

146. On August 13, 2017, the U.S. Office of Copyright issued to Mr. Newton registration number PAu-3-871-222 a Certificate of Registration for his literary title “**Cleveland Strangler.**” It was a personal true crime story. Emphasis Added.

147. On or around February 2018, Mr. Newton moved to Los Angeles, California, with the intent to produce his book into a dramatic feature film or television series for streaming.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Karen Leigh Clayton
Acting United States Register of Copyrights and Director

Registration Number

PAu 3-871-222

Effective Date of Registration:

August 13, 2017

Copyright Registration for One Work by One Author

Registration issued pursuant to 37 CFR §202.3

Title

Title of Work: Cleveland Strangler

Completion/Publication

Year of Completion: 2017

Author

• Author: Charles D Newton
Author Created: text
Citizen of: United States

Copyright Claimant

Copyright Claimant: Charles D Newton
145 Chestnut Lane, 310, Richmond Heights, OH, 44143

Rights and Permissions

Organization Name: Ultimate Impact Productions
Address: PO Box 43432
Richmond Heights, OH 44143 United States

Certification

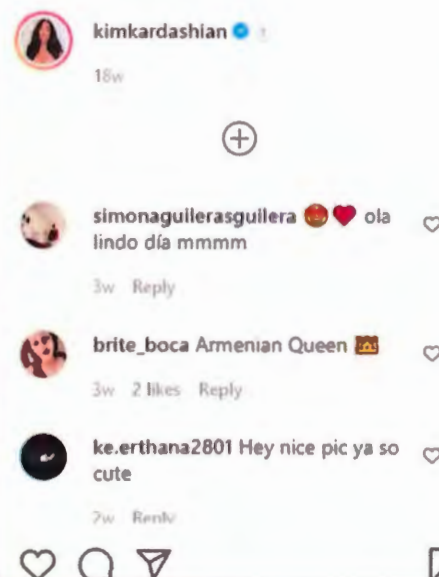
Name: Charles D Newton
Date: August 13, 2017
Applicant's Tracking Number: cs06182006

148. On November 30, 2018, Defendant Kanye West aka Ye seems to reference Mr. Newton's workstation and knowledge of his copyrighted material.

149. In an Instagram post, Mr. West is seated in a chair with a high pillow back. With a protruding tongue, he mimics a *strangled* person choking. This is a direct correlation to Mr. Newton's true crime story *Cleveland Strangler*.



- 1 **150.** On April 23, 2020, Kim Kardashian infringed on Mr. Newton’s copyright (unauthorized
2 use and piracy) when she posted to her Instagram a series of photographs that reflected
3 the storylines from his true crime story. Likely facilitated by computer fraud (hacking).
4
- 5 **151.** Around this time, the manuscript and screenplay were on the hard drive of *his laptop*.
6
- 7 **152.** On April 23, 2020, Kim Kardashian donned a *gray* dress and *jewelry* that appeared to
8 mimic Mr. Newton’s main character in walking down the so-called “The Stroll” a street
9 depicted in his true crime story. Most significantly, Ms. Crutcher donned jewelry later
10 confiscated.
11
- 12 **153.** Vernice Crutcher was a sex worker on the streets of Cleveland, Ohio. Her jewelry was
13 taken by Anthony E. Sowell aka the Cleveland Strangler. He would eventually strangle
14 and kill *eleven women* later found in and around his home in November 2009.
15
- 16 **154.** Defendant Kim Kardashian has a *level slider emoji* in the caption.
17
- 18 **155.** “Apple and Google go up to *eleven*. Commonly used for various content audio recording
19 and *production* as well as music more generally. May also be used for figurative senses
20 of level, e.g., next level...” – EMOJIPEDIA. Emphasis added.
21
- 22 **156.** Kardashian’s gray dress is significant to Crutcher’s *gray watch* taken by Sowell in 2006
23 and later discovered and identified by Vernice Crutcher and Mr. Newton in a coroner’s
24 photograph on November 5, 2009. *Jewelry* retrieved from Anthony E. Sowell’s (aka The
25 Cleveland Strangler) home.
26
27
28



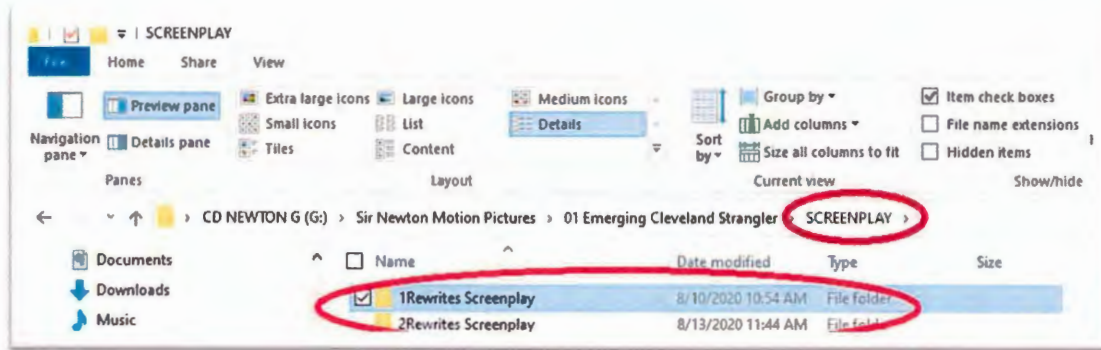


157. On May 25, 2020, Kim Kardashian posted to Instagram a photo of herself dressed in a snakeskin suit, ponytail, fur coat, and sunglasses, with a car directly behind her. She appears to be standing on clouds via a filter.
158. This photo *references* (Cleveland Strangler survivor) Vernice Crutcher who was *killed in a hit-and-run* on December 17, 2017. Another tangible evidence of copyright infringement (unauthorized use and piracy). Interestingly Defendant Khloe Kardashian commented - “What’s happening?”

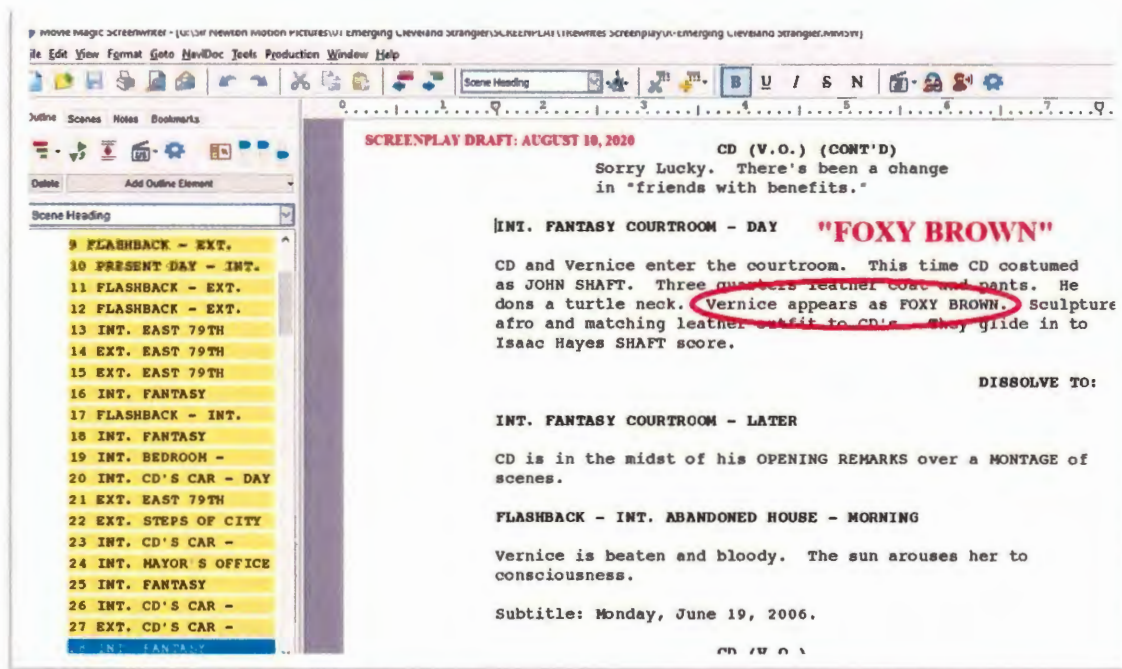


159. Kim Kardashian would later delete this offensive photograph from her Instagram page.

160. On or about August 10, 2020, Mr. Newton was developing a Cleveland Strangler screenplay on his laptop.

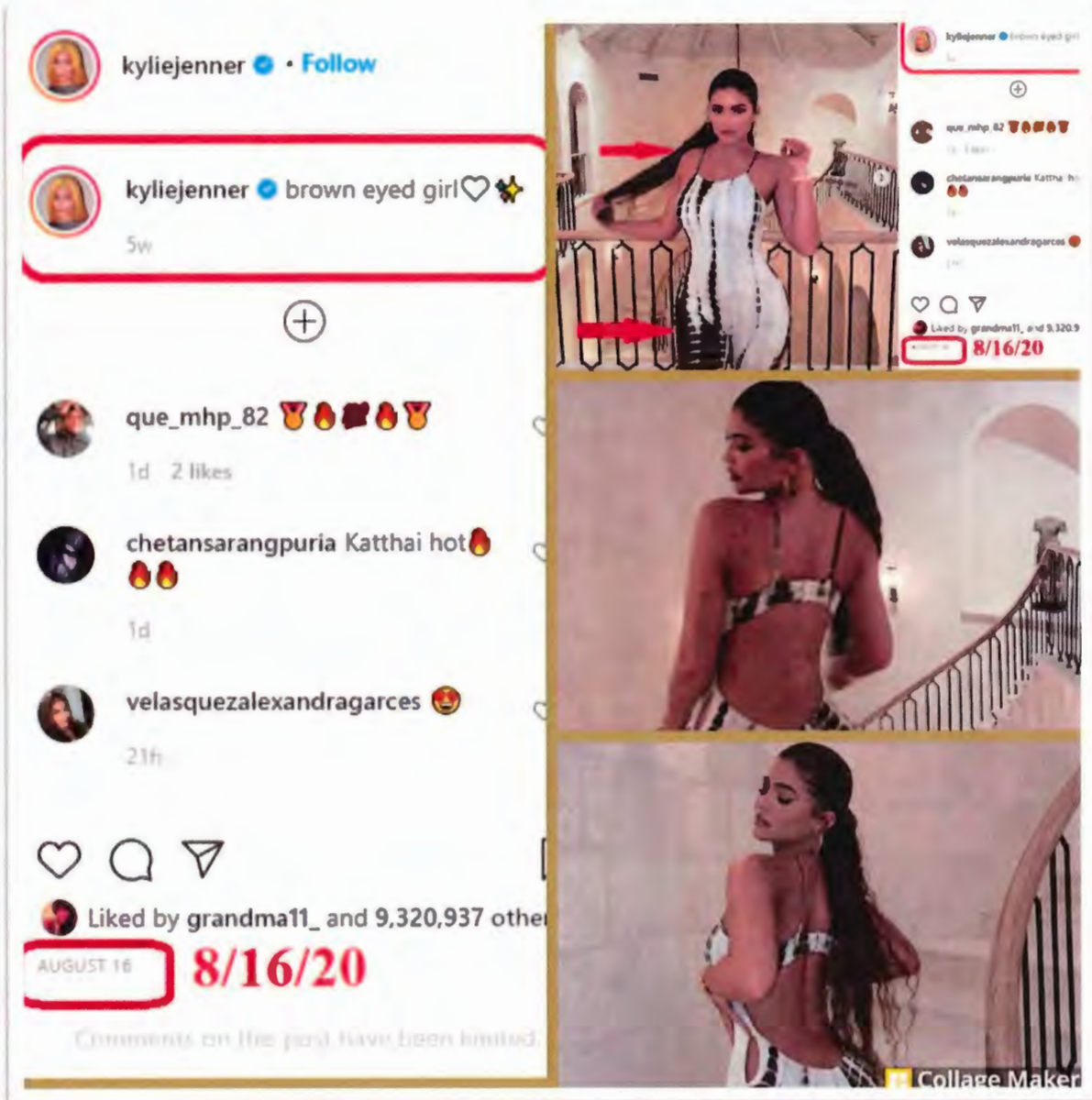


161. On or about August 10, 2020, Mr. Newton wrote a “Fantasy” scene involving himself and his girlfriend Vernice Crutcher. He was costumed as 70’s blaxploitation hero “Shaft” and Vernice as “Foxy Brown.”



162. On August 16, 2020, Defendant Kylie Jenner posted to her Instagram a series of photographs of herself very tanned in a *brown* and white *bell-bottom jumpsuit* (A popular female attire from the 70s). Captioned: “*Brown-eyed* girl.” Followed by a white or gray heart and sparkling stars emojis. In her subsequent photos, Ms. Jenner has her back towards the camera. The last one she appears to hold herself with eyes closed.

(Romantic gesture between lovers) These Instagram posts demonstrate unauthorized access to Mr. Newton's copyrighted material facilitated by computer fraud.



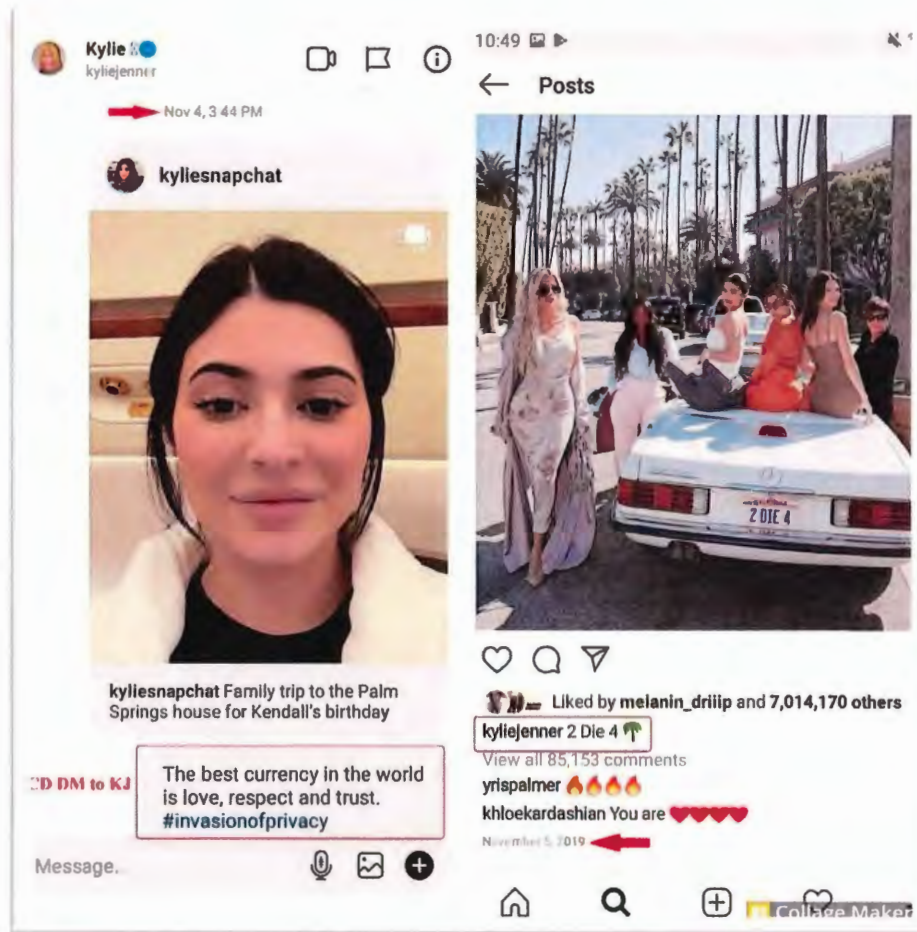
THIRD CAUSE OF ACTION

INVASION OF PRIVACY

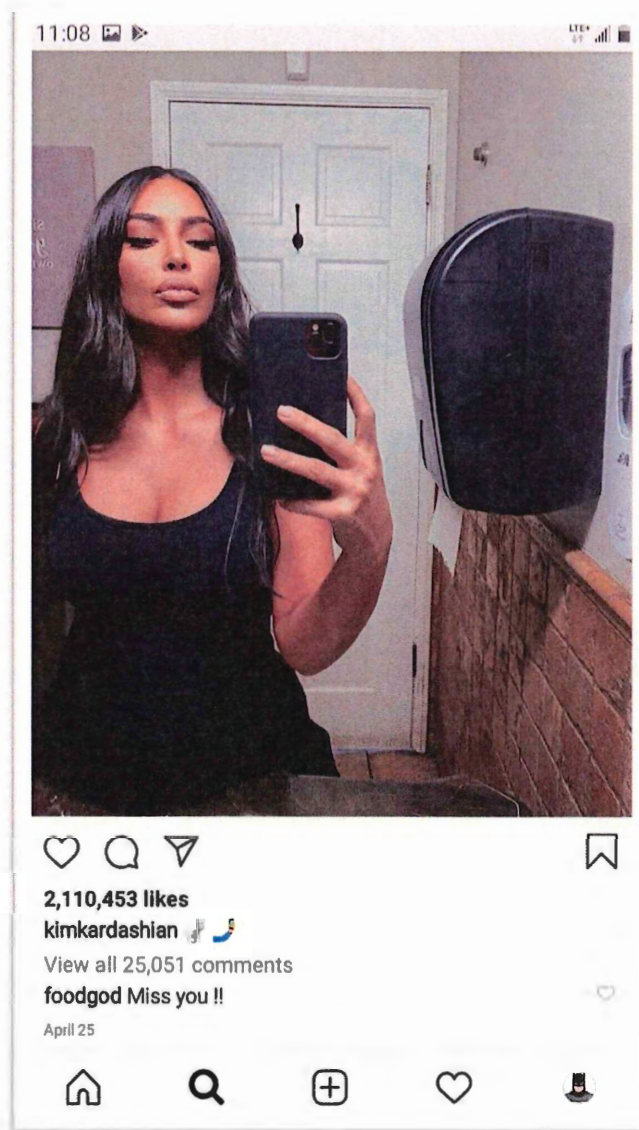
(as Against All the Defendants)

163. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

164. On November 4, 2018, Mr. Newton suspected the Defendants of cybersecurity he accused Defendant Kylie Jenner of *"invasion of privacy,"* via Instagram direct messaging (DM). On November 5, 2018, she appeared to have responded with an image on Instagram of her mother and siblings in and around a white Mercedes Benz. The license plate read: "2 DIE 4" Captioned: "*2 Die 4.*" Followed by a palm tree emoji.



165. On or around April 2020 Mr. Newton recalls being alone in his bathroom with his smartphone. He distinctly had a black towel around his waist while sitting on the toilet. A short time later Ms. Kardashian posted to her Instagram a photograph of herself reflecting a very similar scenario. She chose two noteworthy emojis. *A toilet and an arm with a hand holding a phone.* Distinct evidence of voyeurism. This was a clear violation of Mr. Newton's Right to Privacy via cybersecurity (hacking).



166. On or around June 12, 2023, a co-worker (Jade) asked Mr. Newton why he had *grey duct tape* covering his smartphone's cameras. He replied: "to keep hackers from viewing him and his surroundings." A day or two later Mr. Newton noted Ms. Carter had posted to her Instagram a series of photographs that seemed to picture her donned in an entire outfit reflecting the "*grey pattern of duct tape*." She or her agents seemed to eavesdrop on the prior exchange. A violation of Mr. Newton's Right to Privacy facilitated by cybersecurity (hacking).



167. ALL the defendants via cybersecurity and cyberstalking in various instances have violated Mr. Newton's Right to Privacy since 2018 till present.

168. On or around December 30, 2021, Mr. Newton sent an identical letter to both Deputy District Attorney Linda R. Rosoborough (Los Angeles, CA) and Civil Attorney Omid

1 Khalifeh. In the letter he mentioned the documentary; “I would like you to see “Rich,
2 Famous, and NO Consequences,” (RFNC) I’ve stumbled upon *high-profile celebrities’*
3 *cybersecurity ring*.” He continued and requested Attorney O. Khalifeh (Cyber Law) for
4 representation. “Represent in a civil suit: Charles D. Newton v. *Celebrities #1-#10*, John
5 Does & Jane Does, (Hackers).
6

7 **169.** It is noteworthy that Mr. Newton never identified by name who the “celebrities #1-#10”
8 were. Nevertheless, Defendants Kim Kardashian and Halle Berry in subsequent
9 Instagram posts appear to covertly refer to this confidential information. Which was sent
10 via certified mail.
11

12 **170.** On or around January 11, 2022, Defendant Halle Berry posted to Instagram a photograph
13 of herself seated sideways in a *wicker chair*. Captioned: “Dust *settles*, I don’t...”
14

15 **171.** Mr. Newton perceived this was a cryptic post with inference to the confidential letter to
16 the deputy district attorney and the cyber law attorney. Ms. Berry is seated sideways in a
17 wicker chair with her hand on her thigh.

18 **172.** This reminded Mr. Newton of a photograph from his true crime novel of his girlfriend
19 and himself. Also, in a wicker chair with his girlfriend on his lap and his hand around her
20 waist.
21

22 **173.** Ms. Berry knew that once Mr. Newton saw it would make the connection. The Instagram
23 post had a hidden message intended for him. Defendant Ms. Berry’s message was, for her
24 alleged role in the cybersecurity (hacking) ring in the pending civil lawsuit, she had no
25 intention of “settling.”
26
27
28

December 30, 2021

Dear Attorneys Linda R. Rosborough and Omid Khalifeh

Re: Representation and Private Screening Invitation

Hello, my name is Charles D. Newton. I am an author and film maker. EP Sir Newton Motion Pictures. You can verify my identity via @MrCDNewton with Twitter and Instagram. I am currently producing a whistleblower documentary I would like for you to see please. ("Rich, Famous and NO Consequences" - #RFNC)

I've stumbled upon a high-profile celebrities' cyber security (hacking) ring.

Essentials:

- \$100 for the hour of your time for the meeting/private screening (if permissible)
- Mr. O. Khalifeh, please bring a Standard Agreement Contract (if we decide to go forward)
- 2-Vaccinations and 1-Booster shot, and Mask required (I've had my shots)
- You may bring only one other person (Someone trusted and significant in your firm)

Strategy for DDA Linda R. Rosborough

- *Legal Adviser/Spokesperson
- Launch criminal investigation: Potential charges: Cybercrimes and Invasion of Privacy
- WE deliver in person to FBI-LA office vital evidence ("RTS" Package, USPS tracking, Windows Defender Protection History, Screenshot exhibits, etc.)
- Potential Federal charges: Mail and Wire Fraud
- *2% of sale = \$10 mil (May go higher)

★ Pending law suit.
No party is named.

Strategy for Entertainment / Civil Attorney Omid Khalifeh (Cyber law)

- Arrange CONFIDENTIAL screening of whistle-blower documentary at your office.
- EP Attendees: Netflix, Amazon Prime, HBO Max, Dateline, 20/20 True Crime, 60 Minutes, etc.
- Bid officially starts at \$500 mil for U.S. & Worldwide Rights
- 5% of sale = \$15 mil (May go higher)

• Represent in civil suit: Charles D. Newton v Celebrities #1- #10, John Does & Jane Does (Hackers)

| OFFICIAL USE | | OFFICIAL USE | |
|--|--------|--------------|------|
| Certified Mail Fee | \$3.75 | 0005 | 8874 |
| Extra Services & Fees (check box, add fee) | \$3.05 | | |
| Return Receipt (hardcopy) | \$0.00 | | |
| Return Receipt (electronic) | \$0.00 | | |
| Certified Mail Restricted Delivery | \$0.00 | | |
| Adult Signature Required | \$0.00 | | |
| Adult Signature Restricted Delivery | \$0.00 | | |
| Postage | \$0.58 | | |
| Total Postage and Fees | \$7.38 | | |

Postmark: DEC 30 2021

Collage Maker



174. The only way she could have access to this confidential information was facilitated by cybersecurity or computer fraud. Resulting in a violation of his lawful right to privacy.
175. On or around January 11, 2022, Defendant Kim Kardashian posted to Instagram a series of photographs of herself. Captioned: *"Suit yourself"*
176. Mr. Newton perceived this was a cryptic post with inference to the confidential letter to the deputy district attorney and the cyber law attorney. Sent via certified mail on December 30, 2021.
177. The Instagram post had a hidden message intended for him. Ms. Kardashian's message was for her alleged role in the celebrity cybersecurity (hacking) ring in the pending civil lawsuit, *"Suit yourself,"* while wearing a pair of sunglasses (shades).

178. (Is Ms. Kardashian in the LA District Attorney's office?)

179. The only way she could have access to this confidential information was facilitated by cybersecurity. A clear violation of Mr. Newton's right to privacy.



FOURTH CAUSE OF ACTION

CONSPIRACY

(as Against All the Defendants)

“... if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, *in any manner*, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, *the right of any person*, or class of persons, to the *equal protection of the laws*.” (Emphasis added)

“... or *deprived of having and exercising any right or privilege* of a citizen of the United States, the party so injured or *deprived may have an action for the recovery of damages* occasioned by such injury or deprivation, *against any one or more of the conspirators*.” (Emphasis added)

180. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

181. Soon after a previous complaint was voluntarily dismissed by Mr. Newton, Defendants Kardashians, and Jenners had posted to Instagram a group picture of themselves with an obscene gesture. Captioned: “*If you don’t belong, don’t be long.*” (Emphasis added)

182. This post is a cryptic inference to their past conspiracy to violate Mr. Newton’s Right to Privacy, their willful Copyright Infringement (unauthorized use and piracy), tortious interference, fraud, intentional infliction of emotional distress, and heinous assault.



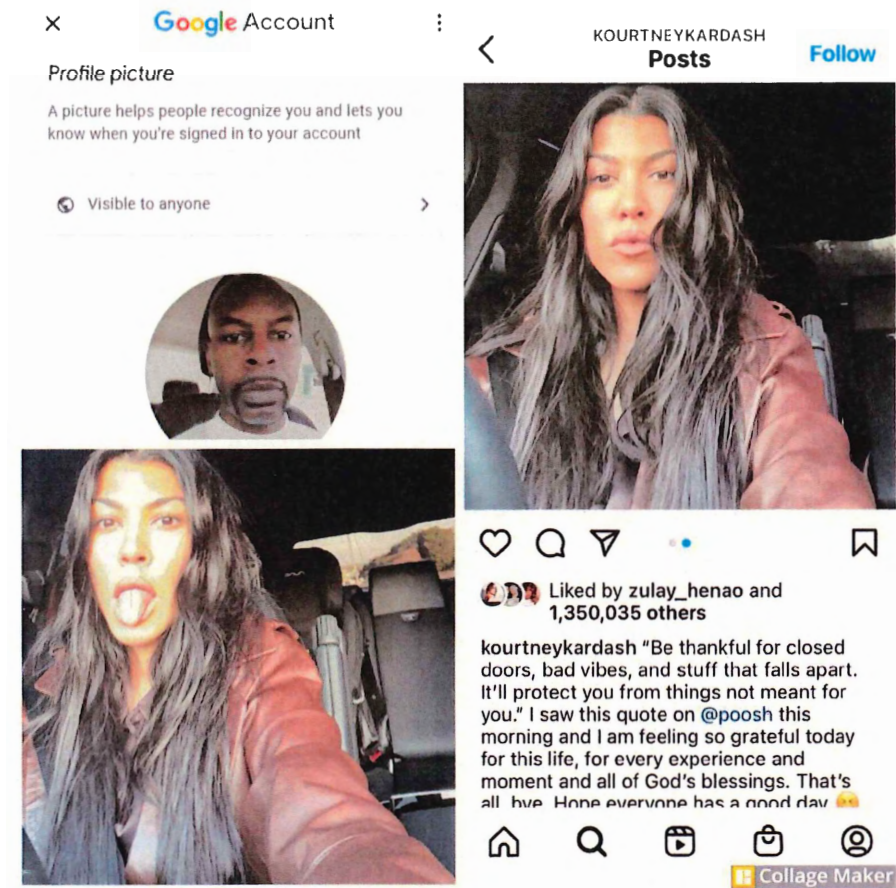
FIFTH CAUSE OF ACTION

TORTIOUS INTERFERENCE

(as Against Kardashians-Jenners and Beyonce Knowles-Carter)

Interference With Prospective Economic Advantage - Tortious interference with prospective economic advantage occurs when a third party or another individual or entity with outside influence interferes with an informal relationship that could create an expectation of economic advantage.

183. On March 30, 2020, Kourtney Kardashian-Barker posted to her Instagram a series of photographs of herself seated inside a car with a seat belt on. (This photograph appears to mirror Mr. Newton's long-standing Google profile picture) Ms. Kardashian-Barker IG captioned: "Be thankful for *closed doors, bad vibes, and stuff that falls apart. It'll protect you from things not meant for you.*" – The next photo has her tongue poked out of her mouth in a jeering manner.



184. Earlier Mr. Newton *privately cast/pitched* via Instagram DM actress Thandiwe Newton for the protagonist Vernice Crutcher in his true crime story, *Emerging Cleveland Strangler: The Vernice Crutcher Untold Story*.



185. Actress Thandiwe Newton appears to *cryptically* respond favorably to the casting/pitch in her Instagram post. Mr. Newton at the very least perceived interest in the character and his true crime story. However, hackers (Defendants) were also watching this private exchange via Instagram DM and Mr. Newton's production efforts for Sir Newton Motion Pictures.



186. Ms. Kardashian-Barker's series of photographs and caption followed shortly after what initially appeared as a favorable response, to months later, the actress' Instagram posts seemed to indicate a change to the reserve. *"It's getting messed up in here."*

187. (Ms. Newton is unaware of the cyber traps set for the Defendants.)

188. On or about April 2020, Ms. Newton's Instagram post indicated access to *private information*. Submitted to her by the Defendants. Obtained only via cybersecurity (hacking). Intent on smearing, to thwart and sabotage Mr. Newton's production efforts of his true crime story.



189. On May 8, 2023, Mr. Newton submitted to Starburst Talent Agency an application and related images of himself for consideration via their website.
190. The website has three stars and a constant flickering self-titled image that mimics a "STARBURST."



Submission information

Application for Representation

Those seeking representation by Starburst Talent must submit a properly filled out application. Note that at this time, we are only accepting SAG and SAG Eligible talent (unless you are being referred to Starburst by your manager).

Why Starburst? *

Hello Starburst Talent Agency,

Two primary reasons come to mind. First, one of your clients (Clifford Martin III) auditioned and secured the role as Anthony Sowell aka the Cleveland Strangler. His uncanny resemblance to Sowell and his riveting performance left an indelible impression. Secondly, Your agency has "liked" many of my Instagram posts that relates to this true crime untold story. As an author, screenwriter-director, and actor, I think we may be an extraordinary fit. A

Name *

Documents

Folders



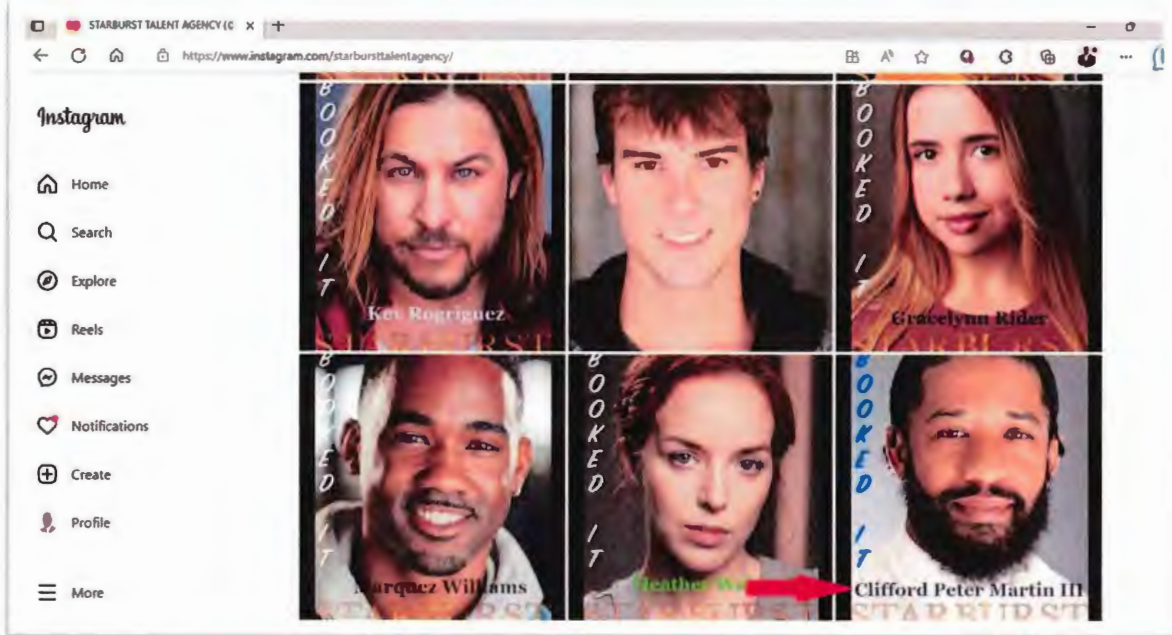
Why Starburst Talent Agency
Documents » 2023 » Doc

5/8/2023 9:50 AM

Collage Maker

191. "STARBURST" talent agency and Mr. Newton follow each other on Instagram. Furthermore, one of their talents, actor Clifford Martin III, was cast as the antagonist Anthony E. Sowell, aka the Cleveland Strangler for a sizzle reel produced by Sir Newton Motion Pictures.

192. Starburst Talent Agency has “LIKED” numerous Instagram posts by Mr. Newton featuring his true crime story Emerging Cleveland Strangler: The Vernice Crutcher Untold Story.





193. Starburst Talent Agency indicated on its website there was a “one-week delay” for each submission.

Submissions (one week delay)

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PRIVACY POLICY

194. Again, Mr. Newton submitted his application and related materials on May 8, 2023. Unfortunately, he did not receive a response. Even though Starburst Talent Agency consistently *liked* his true crime posts and the casting of one of their successful talents.

1 195. On June 12, 2023, while on her world concert Renaissance Tour, Defendant Beyonce
2 Knowles-Carter, posted a series of photographs of herself to Instagram. Her outfit is
3 *identical in the color scheme* as Starburst Talent Agency's logo on their website. *Bronze*
4 *and gold.*
5

6 196. In the initial photograph, Beyonce oddly has an umbrella in her left hand and a
7 microphone in her right hand as she stands before burgundy curtains. She also has a
8 conspicuous long bronze and gold colored sash *wrapped* around her waist. ("It's a wrap."
9 Hollywood speak for its finish or done.)
10

11 197. Based on information and belief, Mr. Newton perceived the umbrella to represent the
12 *Starburst Talent Agency*. An agency typically represents guides, and protects the careers
13 of its talent.

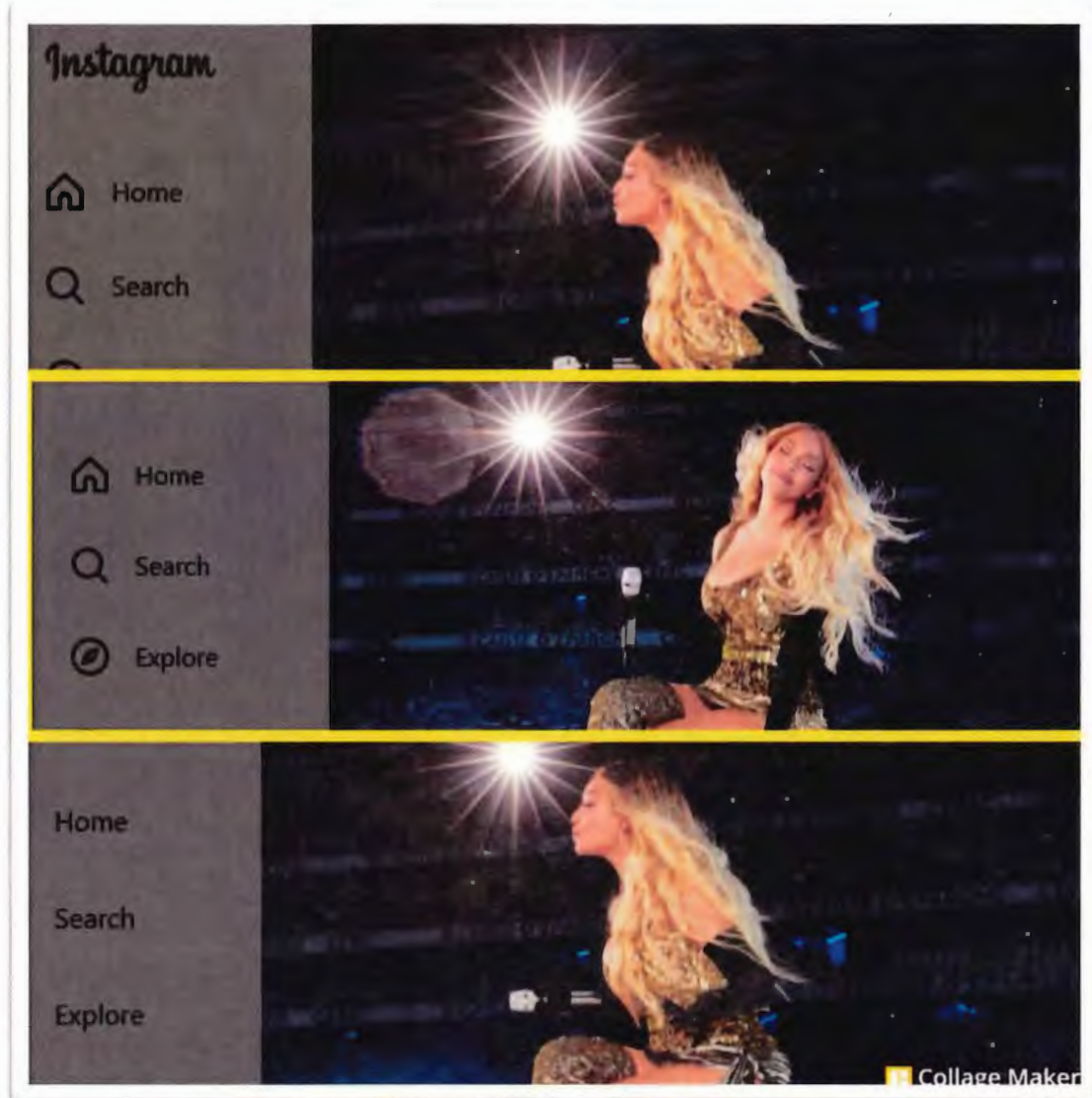
14 198. Beyonce is covertly indicating she knows Mr. Newton then recent application to STA for
15 representation.
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199. The succeeding photographs have Beyoncé appearing as she repeatedly leaning in and out towards a single “starburst.”
200. This Instagram post mimics the *flashes* at Starburst’s website where the title also flickers back and forth. Again, this demonstrates confidential knowledge of Mr. Newton’s application. Likely facilitated by computer fraud (hacking) and unauthorized access to his laptop.

1
2 **201.** In this series of photographs, Beyonce is seated on a piano on stage. (A piano like a
3 computer and/or laptop has a *keyboard*.)
4





202. Coincidentally, Mr. Newton's true crime story starts with him experiencing a *dream* about the events of the story.
203. Beyoncé in the middle image has her head tilted and her eyes closed as if asleep.
204. Based on information and belief, Mr. Newton perceived this was a reference to his screenplay; Emerging Cleveland Strangler: The Vernice Untold Story.

EMERGING CLEVELAND STRANGLER

The Vernice Crutcher Untold Story

Episode 1: "Emerging Cleveland Strangler" - 2004-2006
Episode 2: "House of Horrors" - 2006-2010
Episode 3: "One Size Justice Fits All" - 2010-2013
Episode 4: "Not on my Watch!" - 2013-Present

Adapted from
"Emerging Cleveland Strangler: The Vernice Crutcher Untold Story"

2.

Our focus returns to CD. He is in the midst of a disturbing DREAM. He mumbles repeatedly...

CD
Vernice... Vernice... don't...

We draw closer to his rapidly moving eyelids. We penetrate them and enter his DREAM...

CD (V.O.)
Dreams are interesting. They're often a hybrid between fact and fantasy. That's very true here.

INT. CD'S APARTMENT - EVENING

SUBTITLE: May 2004

Collage Maker

205. In the final photographs, Beyonce conspicuously stands with her *back* to the photographer (photo on the left). Mr. Newton perceived the hidden message to be, likely due to Beyonce's influence, and Starburst Talent Agency will not represent him. "It's a wrap." He's done.

- 1 **206.** On the right Beyonce applied a filter where she appears to be in *motion*. Innuendo for Mr.
2 Newton's production company, Sir Newton Motion Pictures.
- 3 **207.** Also, Beyonce's left hand is extended. Indicating as one of her popular songs says, "to
4 the left, to the left..." Or exit stage left.
- 5 **208.** Mr. Newton has been blacklisted in Hollywood due to the Defendants' malicious actions.
6 Impairs his right to enter a contractual relationship with Talent Agencies.
7
8
9



SIXTH CAUSE OF ACTION

FRAUD AND

FRAUDULENT MISREPRESENTATION

(as Against Beyonce Knowles-Carter)

Fraudulent misrepresentation is a tort claim, typically arising in the field of contract law, that occurs when a defendant makes an intentional or reckless misrepresentation of fact or opinion to coerce a party into action or inaction based on that misrepresentation.

209. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

210. On or around August 2021, Defendant Sean Carter aka Jay-Z during an interview with an entertainment reporter stated about his wife Beyonce, “She is a hard worker, very *detail-oriented.*” – Sharing the Best thing about Working with Wife Beyonce.

211. On September 3, 2021, Mr. Newton posted to his Instagram a cryptic photograph of himself intended for actress Beyonce. He donned a white baseball cap and a designer white short-sleeve shirt. The shirt displayed a large monogram “*A*” *with a large black Spade* below and near his left shoulder. He captioned the post: “A♠” Code for AB. As in the alphabet. A followed by B. Mr. Newton is the lead followed by co-lead actress Beyonce as Vernice Cruther.



212. On September 4, 2021, (Beyonce's birthday) Mr. Newton DM (direct messaged) actress Beyonce a title page screenplay of his true crime story. A pitch that featured multiple episodes and a previous photograph of Ms. Carter presumably in character as Vernice Crutcher in Emerging Cleveland Strangler: The Vernice Crutcher Untold Story.

9/4/21
DM
Beyonce

EMERGING CLEVELAND STRANGLER
THE VERNICE CRUTCHER UNTOLD STORY
EPISODE 1: "EMERGING CLEVELAND STRANGLER" - 2004-2006
EPISODE 2: "HOUSE OF HORRORS" - 2006-2010
EPISODE 3: "ONE SIZE JUSTICE FITS ALL" - 2010-2013
EPISODE 4: "HOT ON MY WATCH!" - 2013-PRESENT

9/6/21
Emailed
Parker
Entertainment
c/o Ms.
Beyonce
Carter

Adapted from
"Emerging Cleveland Strangler: The Vernice Crutcher Untold Story"
(Pending)
By Charles D. Newton
Limited Series
Written by Charles D. Newton



Beyonce
cast as
Vernice
Crutcher

213. On September 6, 2021, via email, Mr. Newton sent a formal pitch to Parkwood Entertainment. Executive Producer Beyonce's production and management company.

Beyonce Pitch as Vernice Crutcher - 1

September 6, 2021,

Dear Beyonce Knowles-Carter, Parkwood Entertainment (info@parkwood-ent.com)

Title: **Emerging Cleveland Strangler: The Vernice Crutcher Untold Story**

Logline: A man pursues justice for an ex-girlfriend whose forgotten attempted-murder cold case implicates the then emerging Cleveland Strangler.

Genre: True Crime, Court room, Social Justice, Fantasy, Romance

Limited Series: Four Episodes – Streaming platform: Netflix, Lifetime, Amazon, Hulu, HBO Max, etc.

True Crime

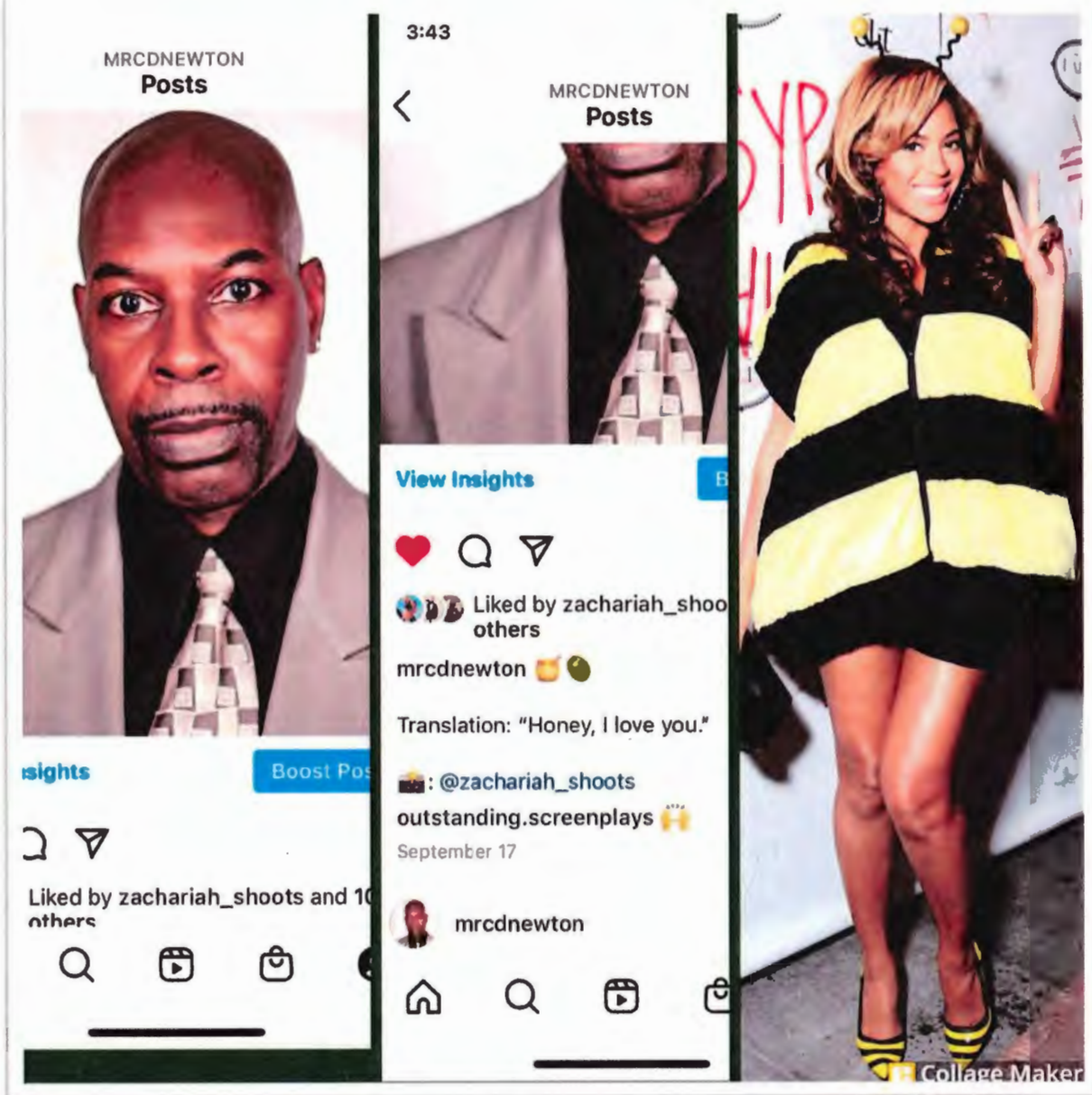
A horrific encounter with an emerging serial killer becomes the catalyst for Vernice Crutcher's sobriety and recovery. However, obstruction of justice and closure by the "system" jeopardizes her recovery. Her relentless battles, internal and external, makes for a riveting true untold story. CD transforms into "Alex Cross," to solve her cold case and crusader for justice. He takes on the system and convicted serial killer Anthony F. Sowell aka the Cleveland Strangler

214. On September 8, 2021, Beyonce posted to her Instagram a series of photographs of herself. Mr. Newton, based on information and belief perceived this was her cryptic and secret response to his casting pitch for future production.
215. Immediately, it is apparent that Beyonce's attire resembles a Spade (♠).
216. She donned a white top with exaggerated puffy sleeves. Coordinated with slim-fit denim bell bottoms. That distinctly resembled the lower portion of a Spade.
217. The photographs in this series are depicted by a unique filter. The photographs intentionally resembled a Polaroid photograph. However, Beyonce's legs and feet are distinctly outside of the picture. As if she is in "*motion.*" - Coincidentally, Sir Newton Motion Pictures – Mr. Newton is the Executive Producer.
218. Furthermore, Beyonce's right hand displayed a "*thumbs up.*"



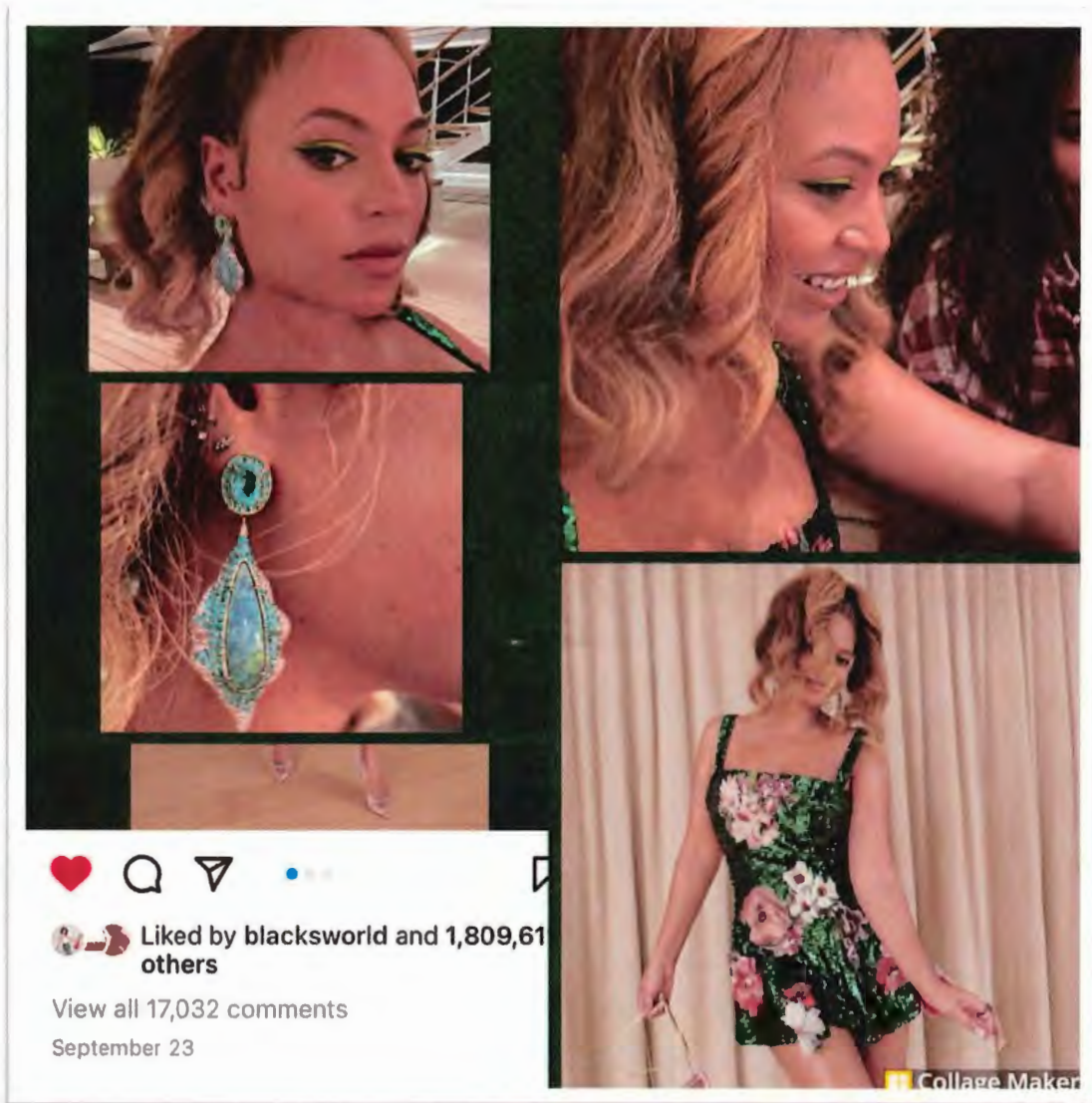
219. Additionally, Beyonce posted an image of herself with hand to chin mimicking the pondering emoji. Indicating she either is or has pondered Mr. Newton's casting pitch.
220. These immediate images followed Mr. Newton's IG post, (Beyonce is not tagged. Nevertheless, she saw Mr. Newton's post) DM, and formal email pitch.

- 1 **221.** Over the next several weeks, Defendant Beyonce Knowles-Carter continued to “audition”
2 (get into character as Vernice Crutcher) via her numerous Instagram posts and in
3 response to Mr. Newton’s subsequent DM (direct messages) while he was in character as
4 himself. The *boyfriend and girlfriend dynamic* from the true crime story.
5
- 6 **222.** Mr. Newton, based upon iconic Beyonce’s actions, thought he had secured a significant
7 casting and talent for the leading lady role. For obvious reasons, he was ecstatic about
8 this *seeming* prospect.
9
- 10 **223.** On September 17, 2021, Mr. Newton continued in character as the boyfriend to actress
11 Beyonce's apparent acceptance of the role as Vernice Crutcher (girlfriend).
12
- 13 **224.** He posted to Instagram an image of himself in an olive-green-colored suit, black shirt,
14 and olive-green tie. Captioned: Honey jar and *green-colored* olive emojis. “Translation:
15 Honey, I love you.”
16
- 17 **225.** This (untagged) cryptic message was for Beyonce widely known as “Queen Bee.”
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226. On September 23, 2021, Beyonce posted to Instagram a series of photographs of herself in a **green dress** decorated with flowers. (Bees pollinate flowers). The images were framed or surrounded by a thick **green border**. In one image Beyonce is smiling as she gazed downward with singer Kelly Rowland by her side. She took a picture focused on her right earring in the shape of a **honeycomb**. Also, among these images was a short **motion** video. Her demeanor appeared to be flirtatious and flattering. Beyonce saw and

1 *responded* accordingly to Mr. Newton's previous Instagram post. Each covertly acts in
2 character.



- 23
- 24 **227.** On September 29, 2021, Defendant Kim Kardashian posted to Instagram a photograph of
- 25 herself tongue poked out and her face covered in *fake tattoos* along with her daughter
- 26 North West. Captioned: "TATS" followed by an emoji hand gesturing the universal "I
- 27 love you," symbol.
- 28

1 **228.** Mr. Newton eventually discovered this post and perceived this had a hidden message
2 intended for him. The “fake tattoos” included a *broken heart* and a *bumble bee* on her
3 face.

4
5 **229.** Ms. Kardashian covertly indicated that Beyonce’s actions and responses (in character as
6 girlfriend Vernice Crutcher) were like the tattoos...*fake*.

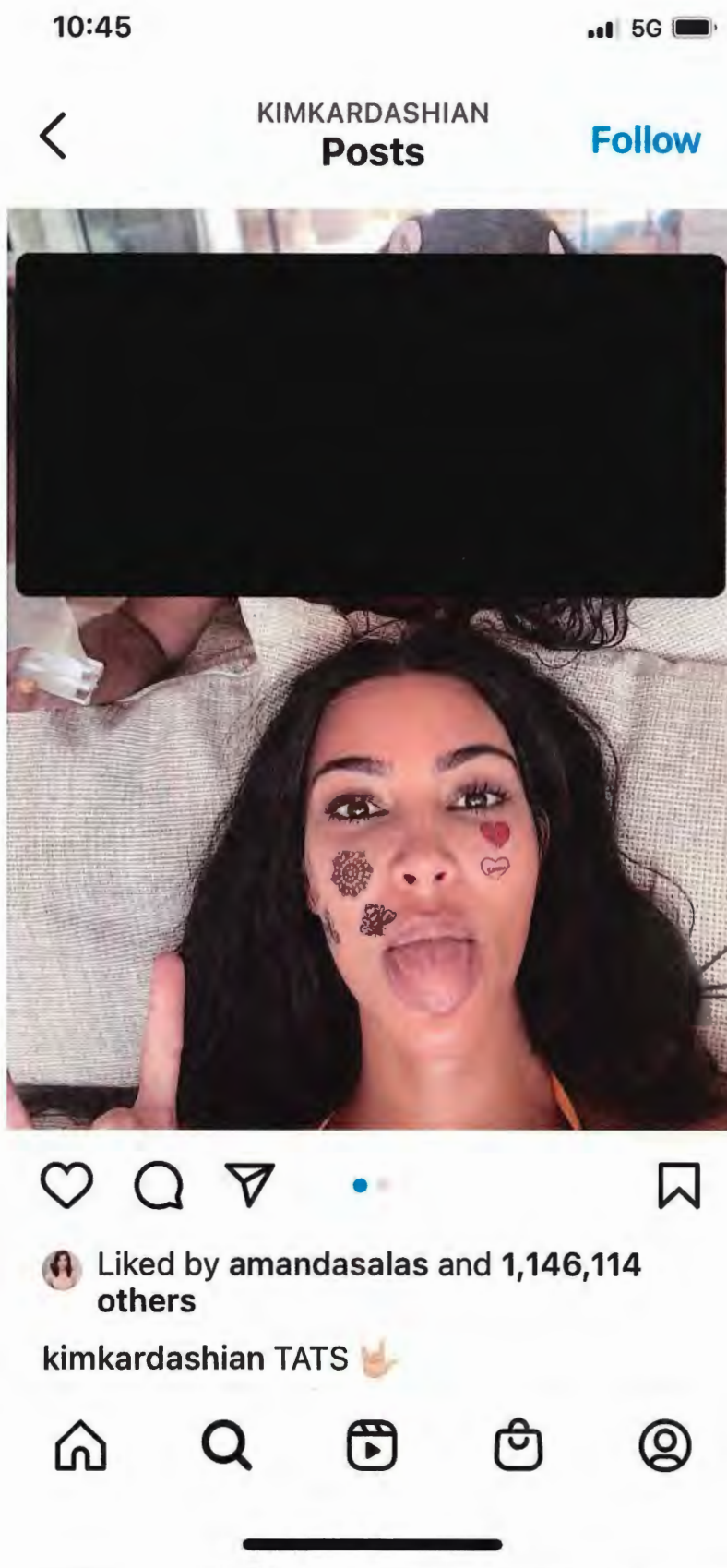
7 **230.** This was a conspiracy (again) to sabotage and hinder Mr. Newton’s casting and
8 production efforts. Maliciously deceives and impedes his civil right to pursue happiness
9 via professional and economic success.

10
11 **231.** On October 13, 2021, Beyonce continued to audition and act in character as Vernice
12 Crutcher when she posted a series of photographs of herself in the same basic colors as
13 Mr. Newton. A high split black and green gown.

14 **232.** Admittedly, some are subtle in their hidden message of fondness. Other images are
15 explicit and overt in her (Beyonce’s) sensuality.

16
17 **233.** Again Ms. Beyonce’s persistent efforts led Mr. Newton to believe that he had secured an
18 iconic actress who had secretly accepted his casting pitch via Instagram DM (direct
19 messages) and formally via email.

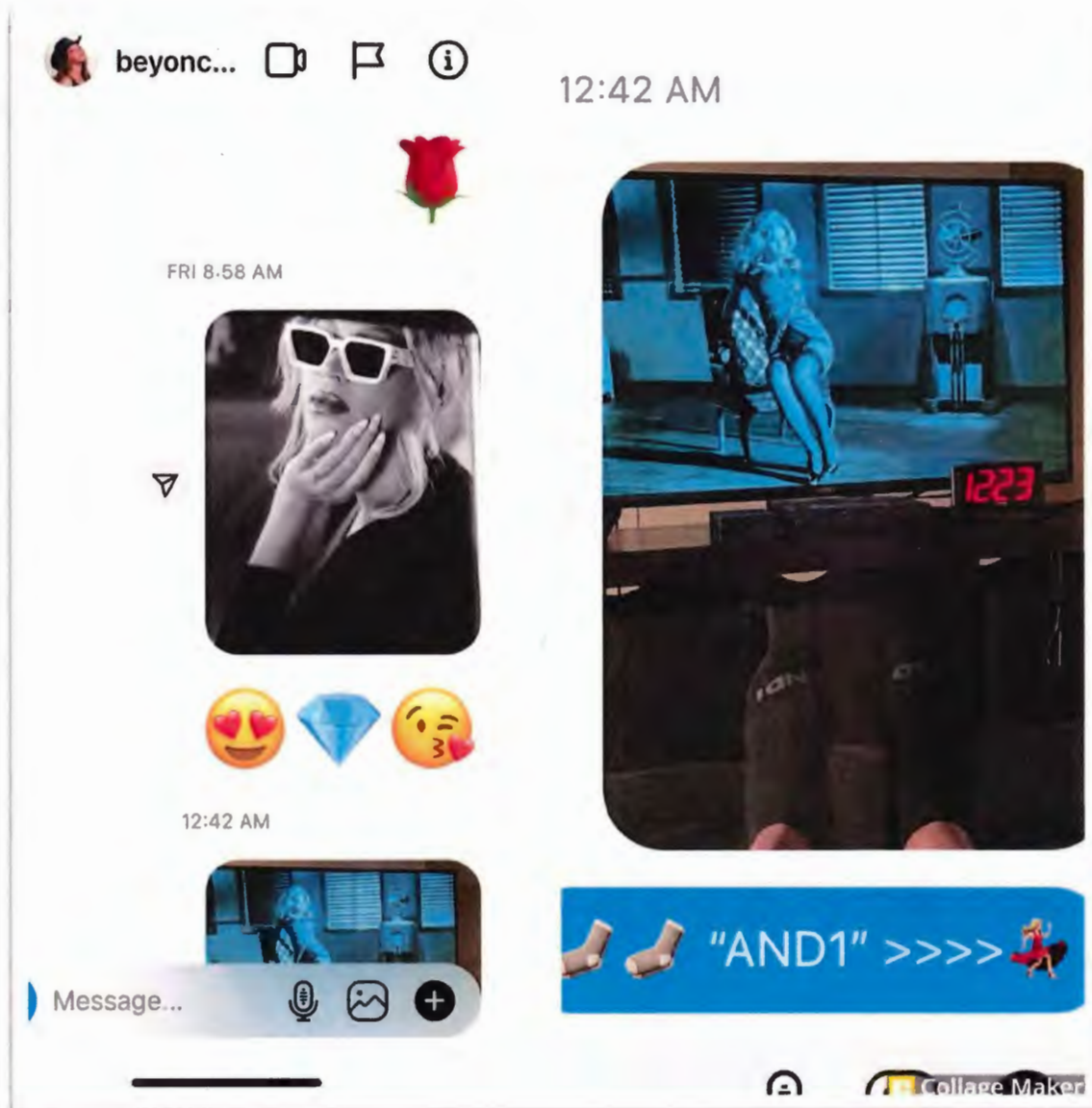
20 **234.** However, Mr. Newton would later discover Beyonce’s fake audition efforts were all
21 fraudulent.
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235. On or about late October 2021, Mr. Newton via Instagram DM (direct messaged) Beyonce while in character as himself from his true crime story. The romantic exchange included: an emoji of a rose. An image of Beyonce wearing sunglasses. A heart-eyes emoji, a diamond emoji, (well before he knew of its coded meaning among the defendants) a kiss emoji. Also, a photograph of himself reclining with his feet only in

view. Wearing socks with the inscription "AND1." Just beyond is a TV displaying one of Beyonce's music videos: "Dance for You."



236. Beyonce responded in kind with an Instagram post that featured her with *heart-shaped* sunglasses. In a burgundy tracksuit, she is seated with her legs extended towards the camera. Beyonce has on a distinctive *pair of socks* that are placed side-by-side form a *heart*.

1 237. Yet again Mr. Newton perceived Beyonce had accepted the casting role, the leading lady,
2 Vernice Crutcher, the earlier pitch for Emerging Cleveland Strangler: The Vernice
3 Crutcher Untold Story.
4



25 238. However, as indicated (by Kim Kardashian's fake tattoos) this was all ruse. A conspiracy
26 to deceive, mislead, and sabotage Mr. Newton's production and business efforts. Such
27
28

malicious actions manifested fraudulent misrepresentation by Defendant Mrs. Knowles-Carter.

SEVENTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(as Against All the Defendants)

Intentional infliction of emotional distress (IIED hereafter) is a **tort** that occurs when one acts in a manner that intentionally or **recklessly** causes another to suffer severe emotional distress, such as issuing the threat of future harm.

239. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

240. Defendant Kim Kardashian acted with IIED when she assaulted and engaged in the murder-for-hire of Mr. Newton's first cousin Thaddeus L. Coleman on or around April 15, 2023.

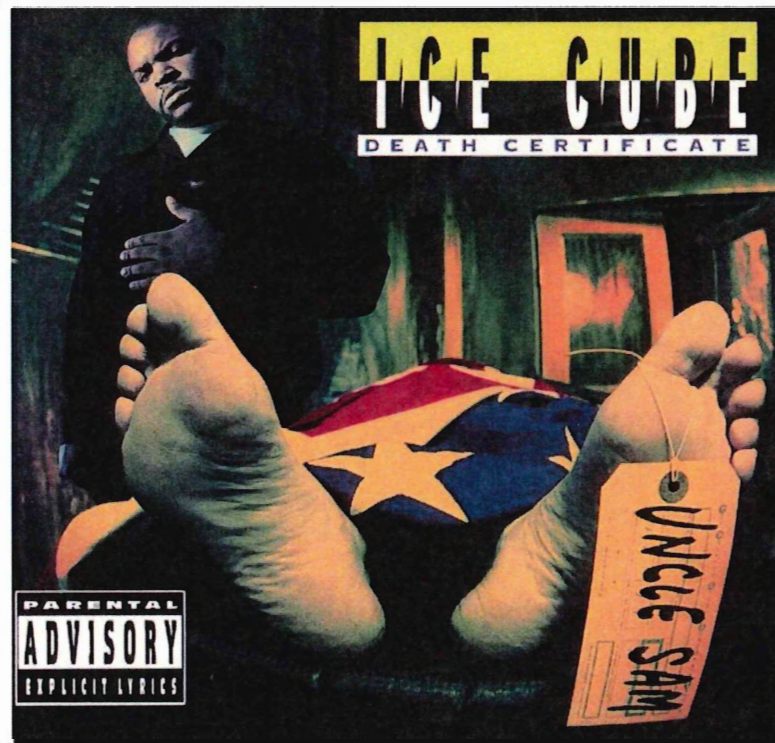
241. On July 17, 2023, Defendant Kim Kardashian acted with IIED when she posted to Instagram a veil death threat. An assault (***threat of drowning***) intended for Mr. Newton.

242. On or around mid-December 2022, Defendant Kanye West aka Ye acted with IIED when he stated to Paparazzi, "There's a lot of ***people coming up missing***. Feels like there's going to be a lot of that."

243. Between March and July 2023, Defendant Kanye West aka Ye acted with IIED when Mr. Newton realized that the images of Mr. West in fisherman boots and/or draped in an American flag were covert symbols or innuendos about the death of his first cousin Thaddeus L. Coleman.

244. Defendant Kanye West aka Ye, weaponized private information facilitated by cybersecurity (hacking). A song by rapper Ice Cube titled, "*No Vaseline*" - 1996, is a favorite on Mr. Newton's YouTube playlist.

245. Moreover, the track appears on Ice Cube's album: "*Death Certificate*." The cover features a corpse draped in the *American flag*. Mr. West has posted several images to Instagram with himself either wearing an *American flag-styled jacket or draped by the flag* while wearing *fisherman* boots. (A fisherman recovered Mr. Newton's first cousin on April 29, 2023, from Lake Erie Marina). This disturbing covert reference is intended to cause trauma and emotional distress on the part of Defendant Kanye West aka Ye.





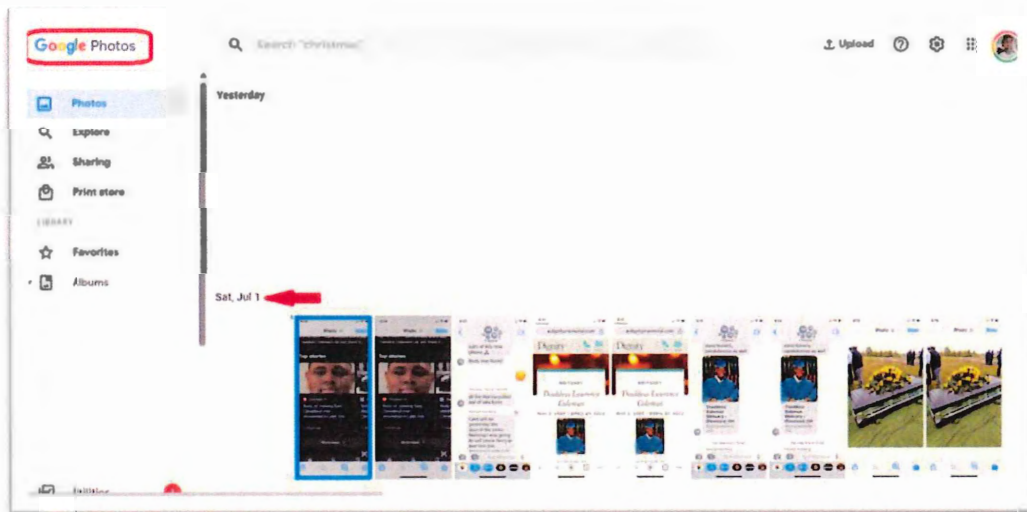
246. Defendant Kanye West appears to have a man carrying a doctor's medical bag walking behind him. He also has diagonal police stripes on. All while draped in the American flag. Again, referencing Ice Cube's "Death Certificate." This disturbing photo seems to imply the local authorities' complicity in the coverup of Thaddeus L. Coleman's true cause of death.



247. On around the 4th of July, Defendant Kanye West aka Ye, posted to Instagram a photograph of himself simulating drowning and with a faded American flag in the background. This traumatizing and malicious photo is an innuendo to the death and drowning of Mr. Newton's first cousin Thaddeus L. Coleman.



248. On July 1, 2023, Mr. Newton added to his *Google Photos Gallery* a collage of images about the recent death of his first cousin TLC, that were copied from his family private group chat/text messages. This would become a cyber-trap for Defendant Beyonce Knowles-Carter.



249. On July 3, 2023, Defendant Beyonce Knowles-Carter posted to her Instagram a *collage of photographs or images* that reference Mr. Newton's Google Photos Gallery about his first cousin TLC's *drowning* demise. Ms. Carter maliciously re-enacted the stages leading to the latter's closed casket funeral due to excessive *bloating*. This wanton public display via her Instagram is reckless and caused emotional distress to Mr. Newton and his family.

P1: Thaddeus L. Coleman's earlier photograph.

P2: TLC drowned. (Ms. Carter mimics water waves with her hair and faces down)

P3: TLC funeral program. (Peace sign = deuces. Slang for good-bye)

P4: TLC was retrieved from Lake Erie/Marina (Note Ms. Carter's "fish lips")

P5: TLC closed casket funeral. (Ms. Carter gestures: Head resting in chin, hand to back = rest-in-peace, and door in background closed = closed casket)



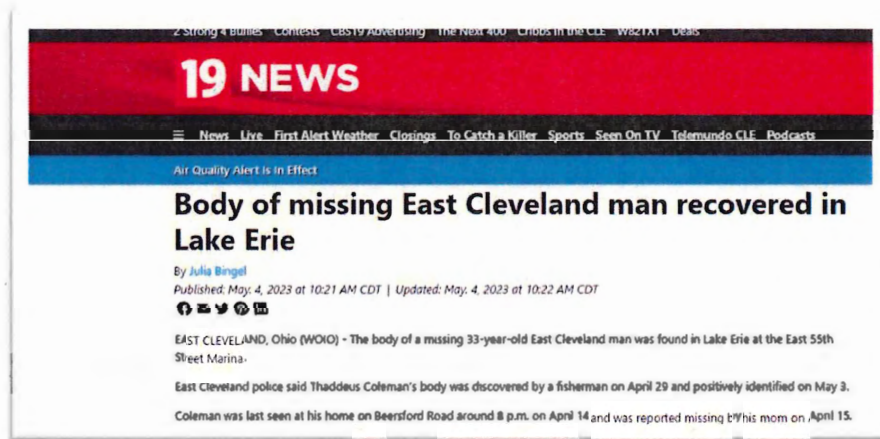
250. ALL the Defendants, as the facts and preponderance of evidence clearly show, have intentionally inflicted emotional distress upon Mr. Newton.

251. Their wanton and heinous behavior is as if they are *above the law* as celebrities.

252. Tragically, these high-profile Defendants have used their powerful influence and resources to persuade local law enforcement to engage in a cover-up and obstruction of justice.

253. In the true cause of Mr. Newton's first cousin Thaddeus Lawrence Coleman's demise.

254. A retaliatory act for filing the computer fraud inspired civil action lawsuit in Los Angeles Superior Court summer of 2022. And a (death) threat not to resume the case later.



EIGHTH CAUSE OF ACTION

(Violation of Assault 18 USC SECT13(a)(1))

ASSAULT

(Against All the Defendants)

“Assault with intent to commit murder or a violation of section 2241 or 2242, by a fine under this title, imprisonment for not more than 20 years, or both.”

“By threatening or placing that other person in fear that any person will be subjected to death, serious bodily injury, or kidnapping; or attempts to do so, shall be fined under this title, imprisoned for any term of years or life, or both.” - (Section 2241)

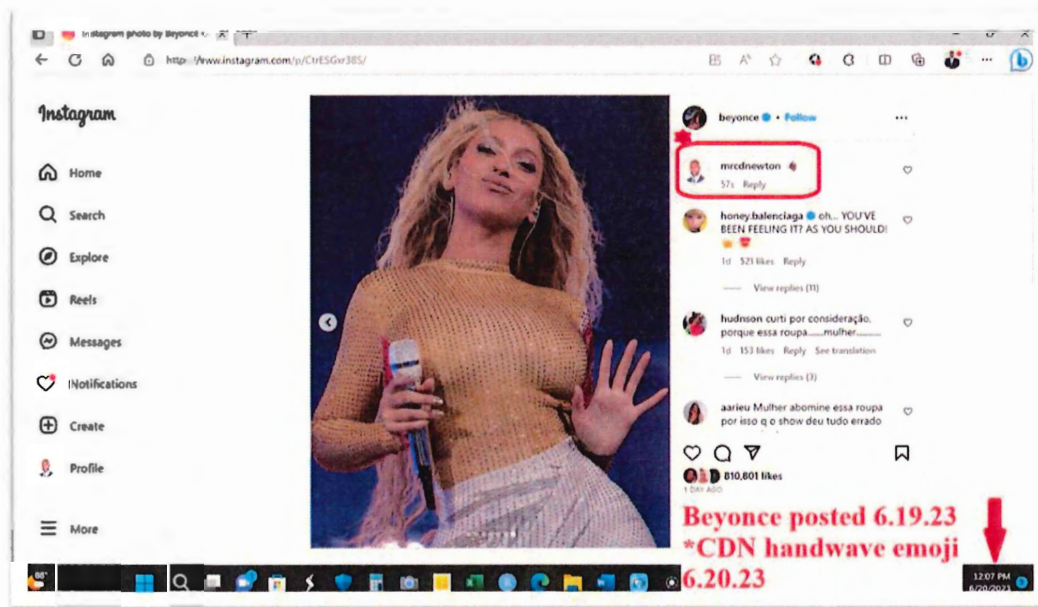
255. Mr. Newton restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

256. On June 20, 2023, Mr. Newton responded to Beyonce’s June 19, 2023, Instagram post, with a single “hand wave emoji.”

257. On June 30, 2023, Ms. Kim Kardashian posted to Instagram a series of photographs (3) of herself wearing a *blue* bikini. Before a large body of water (ocean) in one she has her

head tilted backward. In another, Ms. Kardashian distinctly posed with uplifted arms with the peace sign displayed on each hand. Captioned: "Just a reminder." Followed by a *diamond* emoji.

258. What was the "reminder?" One of Ms. Kardashian's Commenters provided some insight. "KIM THERE ARE PEOPLE DYING." 1,378 likes. Many got the inference from the show that aired in August 2011, season 6 of KUWTK.
259. However, in the last image posted, Ms. Kardashian has her contorted hand conspicuously near her face while wearing sunglasses or shades.
260. Mr. Newton perceived this was a cryptic reference to him following a long inactive contact with Beyonce's Instagram. Ms. Kardashian mimics Mr. Newton's hand wave emoji to Beyonce.
261. The hidden message or "reminder" is the *veiled threat of death by drowning*.
262. Again, just two months ago, on April 29, 2023, Mr. Newton's first cousin TLC's body was recovered from Lake Erie East 55th Street Marina.





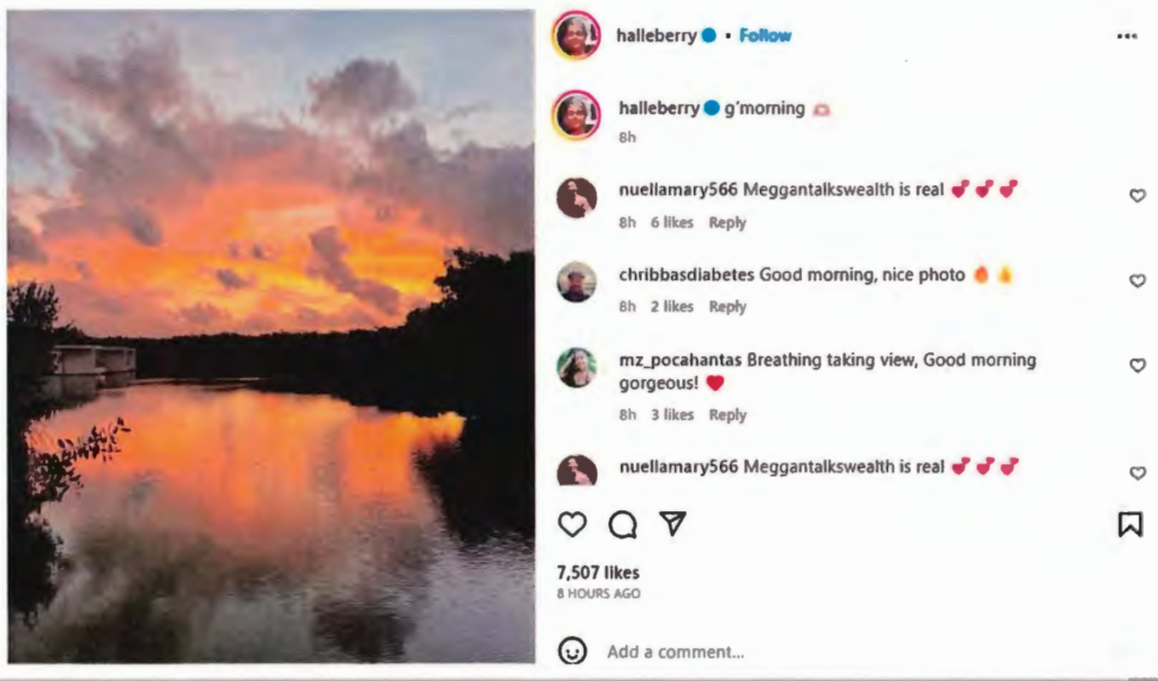
263. On July 4, 2023, Defendant Halle Berry posted to Instagram a series of photographs. In the first image, Ms. Berry is featured *below ground*. She is seated with an uplifted right leg. She donned a black dress a hat and sunglasses.
264. In the second her current boyfriend Van Hunt. He donned an orange hat, and a white robe tied about the waist. (Mr. Newton has on a white suit with his girlfriend Vernice Crutcher wearing a black dress on the new book cover and poster for the documentary Indifference.) He stands holding a grey coffee mug. Mr. Hunt has on a pair of *daisy*

sunglasses. Captioned: “Can’t ruin my vibe today ... and you sure can’t ruin his! (swipe) Happy 4th to you and yours!!”

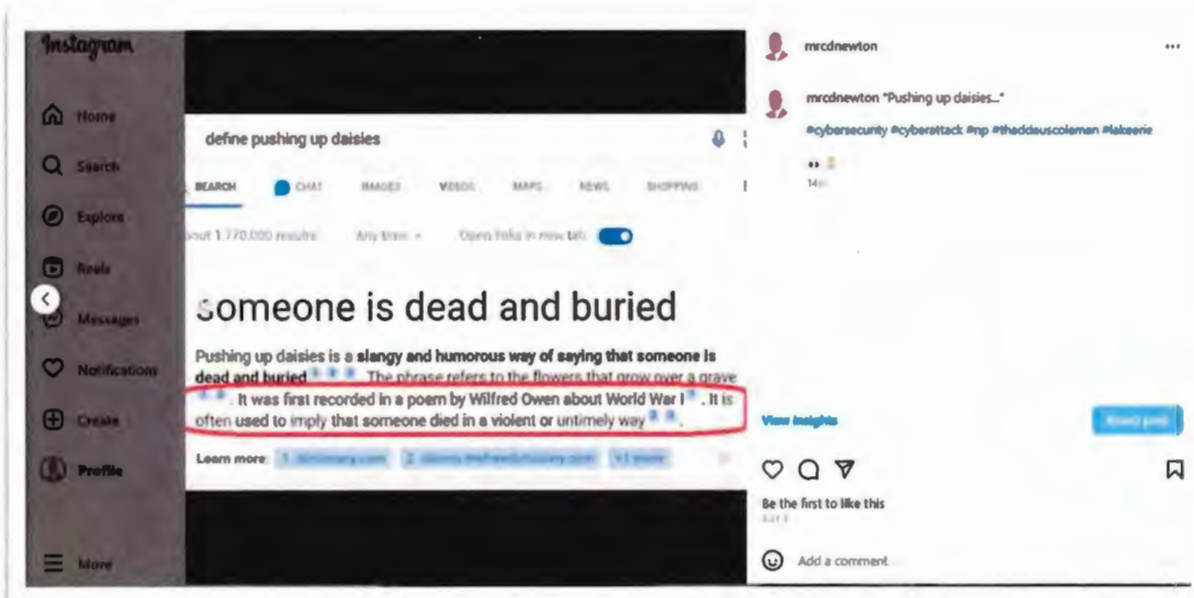
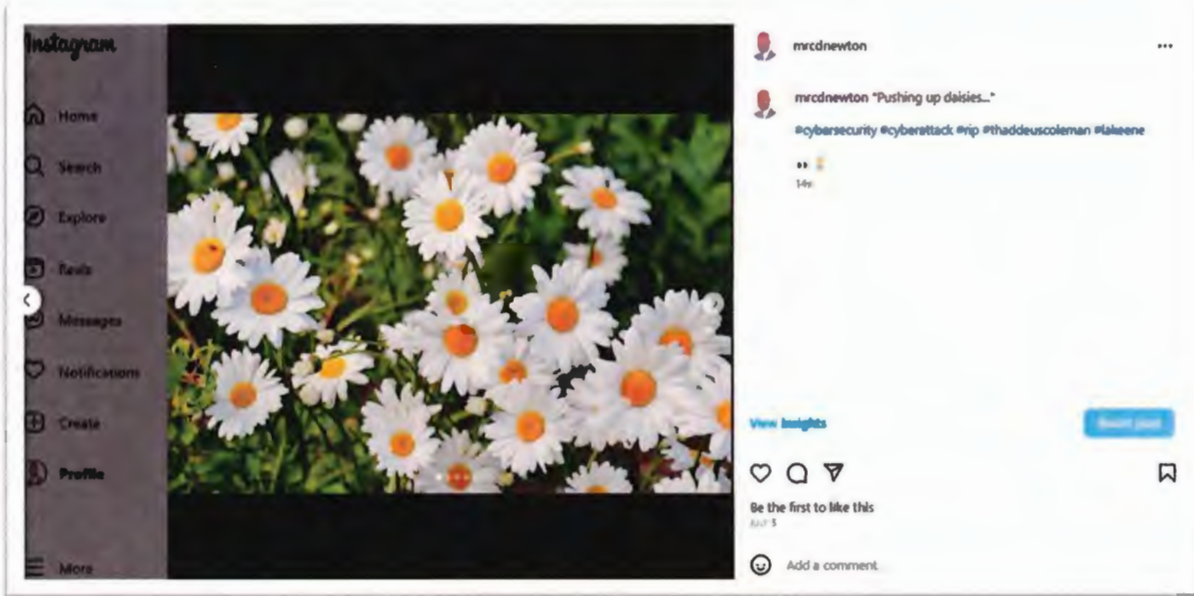
265. Mr. Newton based on information and belief perceived Ms. Berry’s Instagram post had a cryptic message intended for him. The innuendos are *below ground* as in a burial plot. The daisy sunglasses are a symbol of the popular slang expression, “pushing up daisies.” Meaning “*someone is dead and buried.*” Given Mr. Hunt’s appearance, he may be a proxy representing Mr. Newton’s pending demise by the defendants.



266. On July 5, 2023, Halle Berry posted to Instagram a photograph of a *lake or large pond*. Captioned: “g’morning.” Followed by two hands that form a heart emoji.
267. Mr. Newton based on information and belief perceived Ms. Berry’s Instagram post had a cryptic message intended for him. Two letters, the letter o, is *missing* from the word *good*... morning. Possibly to indicate a missing person. The image of a body of water references Mr. Newton’s first cousin TLC. Again, his body was recovered from Lake Erie Marin on April 15, 2023.
268. (Also, noteworthy is the “hands in the form of a heart emoji.” Those same hands can be extended to form two hands strangling someone where they can’t breathe. Similar to a drowning victim.)
269. This post interestingly followed the next day Ms. Berry’s “pushing up daisies” post the day before.



270. On July 5, 2023, Mr. Newton posted to Instagram a series of photographs that included a picture of daisies and internet definitions of the phrase *"pushing up daisies."* He also included the hashtags: *"#cybersecurity, #cyberattacks, #rip, #thaddeuscoleman, #lakeerie.* Followed by the emojis a pair of eyes and an hourglass.



- 1 **271.** On July 7, 2023, Kylie Jenner posted to her Instagram a series of photos (4) of herself.
2 Captioned: “*Yellow* might be my new *favorite* color.”
- 3 **272.** Ms. Jenner donned a bright yellow short-sleeved shirt. Her left hand was conspicuously
4 placed on her full lips with what appeared to be a wedding band. (Distraction?)
- 5 **273.** Based on information and belief Mr. Newton perceived this cryptic post as a direct
6 response to his Instagram post from two days ago. The *yellow daisies* represent the
7 expression “pushing up daisies.” Someone is dead.
8
- 9 **274.** His hashtags make it explicitly clear that he was referencing his recently demised cousin
10 TLC. The emojis (eyes and hourglass) indicated that the perpetrators soon intended the
11 same for him.
12
- 13 **275.** Ms. Jenner’s post in yellow and the caption “*my new favorite color*” is code for someone
14 dead. Mr. Newton perceived this was both a self-incrimination accessory to his cousin’s
15 TLC demise *and* an assault or veil threat of his pending demise.
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276. On July 9, 2023, Ms. Berry appeared to have responded by a series of photographs of herself donned with daisy sunglasses. Captioned: "I got MY sunglasses back. Here's a *Sunday daisy dump.*" (Emphasis added)



277. (Coincidentally, Mr. Newton's first cousin TLC disappeared on Saturday, April 15, 2023. *Sunday, April 16, 2023*, Defendant Kim Kardashian posted to her Instagram an image of her daughter, North West in character as singer-actress Janet Jackson. Captioned: "Poetic

Justice.” Medical Examiner David Dolinak determined the approximate “Date of Death” – *Sunday, April 16, 2023*, inside Lake Erie. – “*Sunday daisy dump?*”)

278. Mr. Newton based on information and belief perceived Ms. Berry’s Instagram post as her accessory to his first cousin’s TLC demise but also, had a cryptic message intended for him.

279. A series of poses, gestures, and objects (binoculars) and an eerily familiar *floor plan* (his San Antonio, Texas, location) are all to convey the hidden message of his imminent demise. A promised fate like his first cousin TLC, “pushing up daisies.” Facilitated by constant surveillance by the Defendants.

280. On July 8, 2023, Kim Kardashian posted to Instagram a series of photographs (2) of herself and her longtime *girlfriend* Lala Anthony. The two are poised very close to each other while gazing at the camera.

281. Lala Anthony has on what appears to be a white-colored outfit. Her right hand is conspicuously placed near her shoulder with her index finger pointing at herself.

282. Ms. Kardashian has on what appears to be a black-colored outfit exposing her shoulders. Her left hand has a large *diamond* ring on her pinkie finger. Captioned: “If you see us happy just leave us alone *plz*, we deserve this one.”

283. Mr. Newton perceived this post as another *veil death threat by drowning* intended for him. The diamond is a cryptic reference to the popular episode from Keeping Up With the Kardashians. When Ms. Kardashian lost her diamond earring and her sister, Defendant Kourtney Kardashian-Barker famously said, “*Kim, people are dying.*”

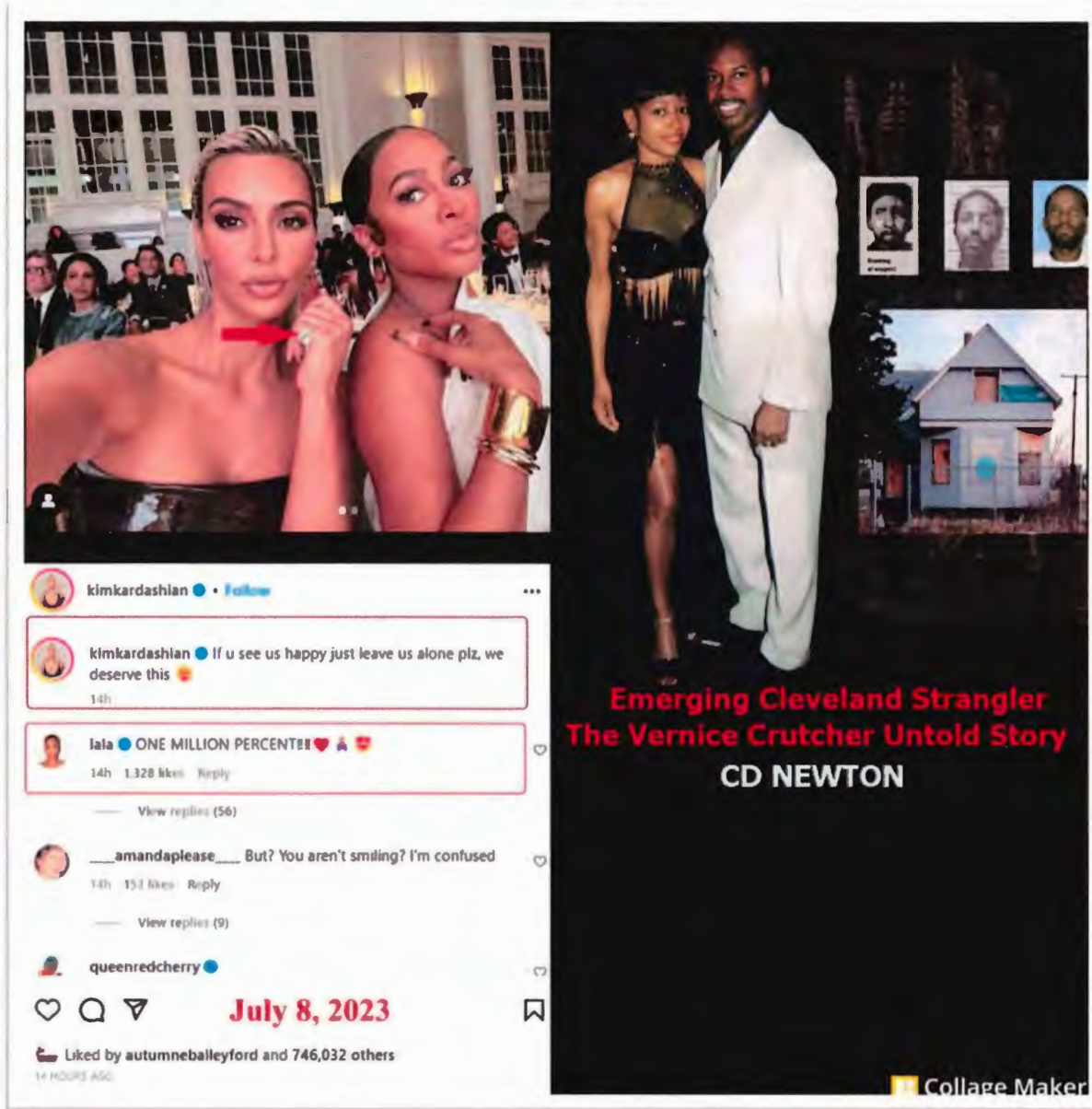
284. Furthermore, this post-Mr. Newton perceived to mimic the new edition book cover and YouTube documentary poster for Indifference. Ms. Kardashian’s and Ms. Anthony’s

1 colors and style of dress appear to reference Mr. Newton's cover and poster.
2 Coincidentally, Anthony Sowell is the antagonist in Mr. Newton's true crime story.
3 Based on these facts, this Instagram post with its hidden message had Mr. Newton as the
4 specific target.
5

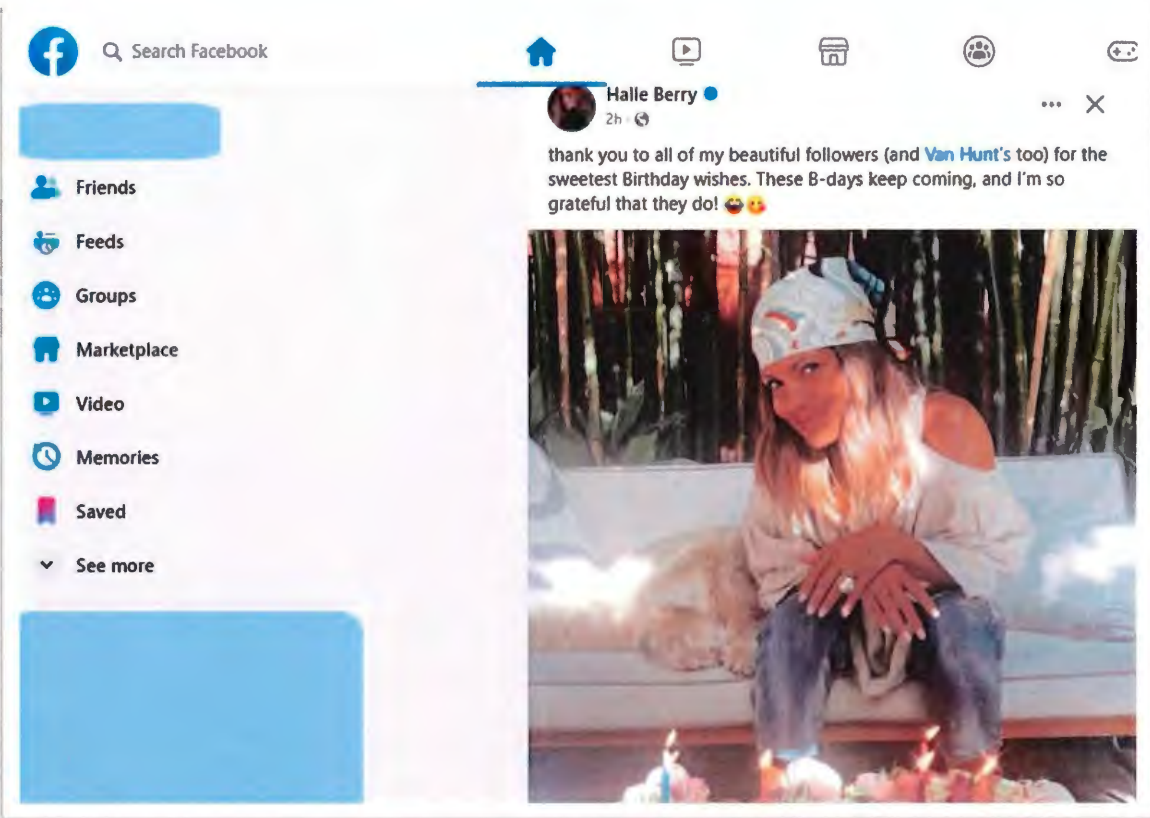
6 **285.** Rather than write out please, Ms. Kardashian uses "plz" instead. Based on information
7 and belief, Mr. Newton surmised this to be an inference to (corrupted) police. An
8 advance notice *not to investigate his pending demise because... *"we deserve this."*

9 **286.** Lala Anthony responded: "ONE MILLION PERCENT!!!" Followed by a red heart, high-
10 five hands, and a face with heart-eyes emojis.
11

12 **287.** (As previously mentioned, Mr. Newton returned to Ohio to inform local authorities of the
13 possible perpetrators of his first cousin TLC. *"I've been doing this for 25 years. He
14 committed suicide."- East Cleveland Detective James Marshae. - But shockingly he
15 discovered that they had informed Ms. Kardashian of his contact and shared confidential
16 information with her.)
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288. On or around July 13, 2023, (While simultaneously thanking birthday well-wishers) Halle Berry posted to social media a photograph of herself. Her head is *wrapped* with a scarf. She has her arms crossed. Her left hand donned a diamond ring. It appears she imitates Kim Kardashian with a conspicuous *diamond* ring. Again, a symbol or code for ... *"Kim, people are dying."* – Specifically, Mr. Newton.



1 **289.** On July 13, 2023, at 12:12 a.m., Mr. Newton posted an out-of-the-ordinary post to his
2 Instagram page. A scripture from the NEW WORLD TRANSLATION. The first word of
3 the cropped scripture was “Jesus.” A post with “spiritual” implications. But also, a cyber-
4 trap.

5
6 **290.** On July 13, 2023, around 3:30 p.m., Ms. Kardashian posted to her Instagram page a
7 series of photographs (2) of her children sleeping. In the foreground Chicago, Psalm (or a
8 nephew), and just beyond Saint. Captioned: “The days are long, but the years are short.
9 Enjoy every second.” In the first image, a shirtless Saint appears to sleep with his face
10 covered by the pillow. The child nearest him dons *Sponge Bob* pajamas with his feet
11 underneath Saint’s private area. Sponge Bob is a fictional character in the underwater city
12 “Bikini Bottom.” – Wikipedia- Chicago, the female sibling appears to sleep quietly.

13
14 **291.** By the second image, the first two children have changed positions. All except Saint. He
15 appears to be still facing down and his face is covered by a pillow. It almost looks as if he
16 has suffocated. Notably, his sibling or cousin now has his legs wrapped around Saint’s
17 waist. The former now has a grey item of clothing placed upon him.

18
19 **292.** Mr. Newton perceived this cryptic post containing a veil death threat via drowning
20 intended for him. Saint’s sibling or cousin’s wrapped legs around him with grey clothing
21 placed upon him indicates drowning in the grey-colored waters of Lake Erie. Hence the
22 suffocating position of Saint. Ms. Kardashian’s Instagram post was some fifteen hours
23 after Mr. Newton posted scripture to his Instagram page.

24
25 **293.** Saint’s name as revealed by his father Kanye West aka Ye, has “spiritual significance.” –
26 Wikipedia. The connection or intended target of the hidden message is apparent.

1 **294.** “The days are long, but the years are short. Enjoy every second.”- Mr. Newton perceived
2 it to be both a warning and a veil death threat.

3 **295.** There seems to be a consistent reference to death by drowning by Ms. Kardashian. Her
4 Instagram posts are tangible evidence of self-incrimination over her involvement in Mr.
5 Newton’s first cousin TLC. Brazenly threatening to do the same to Mr. Newton. (Assault)
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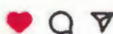
Jesus. ¹⁵ This saying is trustworthy and deserving of full acceptance: Christ Jesus came into the world to save sinners. ^o Of these, I am **foremost**. ^p

mrcdnewton

mrcdnewton 17h

View insights

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1 like
17 HOURS AGO

July 13, 2023

Add a comment

P People.com

<https://people.com/parents/all-about-kim-kardashian-kanye-west-children>

All About Kim Kardashian and Kanye West's 4 Kids

North West, 9

Saint West, 7

Chicago West, 5

Psalm West, 4

West and Kardashian's second child, Saint West, was born on Dec. 5, 2015, in L.A. West gets the credit for choosing Saint's uncommon name. Apparently, the rapper was "going back and forth for a while" before landing on Saint because he wanted the name to have "spiritual significance." A friend of West told PEOPLE, "It needed to mean something and he agonized over it, probably eve...

[See more on people.com](#)

Author: Hannah Kerns

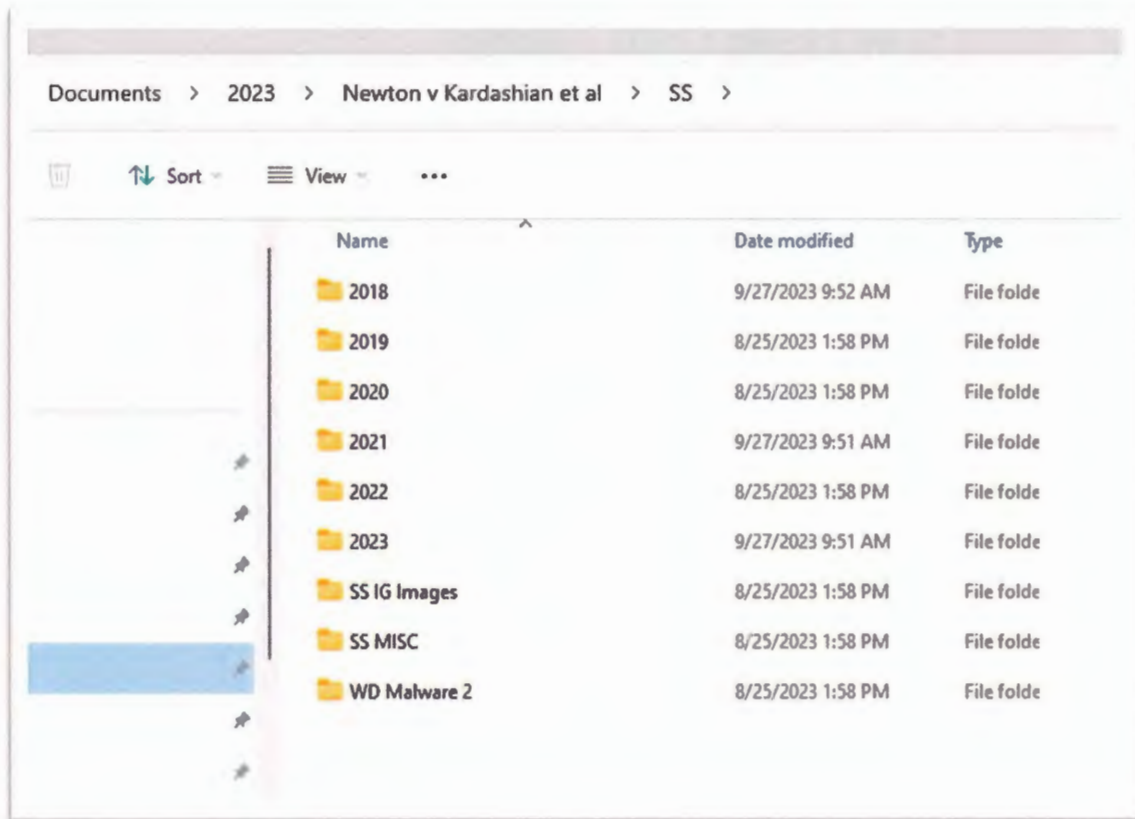
"Saint's uncommon name...he (Ye) wanted the name to have "spiritual significance."

Collage Maker



WITNESSES AND DISCOVERY

296. There are dozens of witnesses and a plethora of documented evidence spanning from 2018-2023. Sufficient to sustain a fact-finding jury trial. This “whistleblower” civil action with its elite organized-crime implications is of the utmost concern for public safety *and* the rule of law.



297. Finally, Res ipsa loquitur – (Latin: The thing speaks for itself) – A doctrine in common law which a *court can infer... injury* in the absence of direct evidence on *how the defendant *behaved in the context of tort litigation.*” Emphasis added. - Wikipedia

298. *The Defendants’ respective social media posts and related timelines (plaintiff’s before and defendant’s after) are *self-incriminating* “preponderance of evidence.”



PRAYER FOR RELIEF

- A. For general and economic damages (past and future) according to proof at trial;
- B. For pre-judgment and post-judgment interest according to the law;
- C. For the cost of the suit and attorney's fees to the fullest extent permitted by law;
- D. For intellectual property theft;
- E. For wrongful death;
- F. For pain, suffering, and mental anguish;
- G. For loss of reputation;
- H. For punitive and exemplary damages;
- I. **For 3 Billion dollars in damages and**
- J. For such other and further relief as the Court may deem proper.

Data Analysis with R Programming



Completed by **Charles Newton**

March 26, 2023

37 hours (approximately)

Grade Achieved: 94.92%

Charles Newton's account is verified. Coursera certifies their successful completion of Data Analysis with R Programming



Data Analysis with R Programming

Google



4.8 (6,776 ratings) | 320K Students Enrolled



DATE: January 1, 2024

Respectfully submitted,
Charles D. Newton
Pro Se Litigant
Law School Student
Data Analyst/Screenwriter